

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

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In re:

Michael K. Schold  
Christine M. Schold  
Debtors

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Chapter 13  
Case No.: 13-40145-HJB

**First and Final Application by Counsel to the Debtors, Philip M. Stone, Esq,  
For Compensation under 11 U.S.C. §329(a) and MLBR 2016-1**

Now comes Philip M. Stone, Esq, as Counsel to the Debtors (the “Applicant”) and pursuant to 11 U.S. C. §329(a) and Federal Bankruptcy Rule of Procedure 2016 and Local Rule 2016-1, respectfully submits the following:

1. On January 24, 2013, Michael K. Schold and Christine M. Schold (hereafter the “Debtors”) commenced a Chapter 13 Proceeding in the United States Bankruptcy Court for the Central District of Massachusetts.
2. As counsel to the Debtors, Attorney Stone received a flat fee of \$3,500 to file the pleadings required under chapter 13, including a *First Proposed Plan*, pursuant to the *Retainer Agreement* with the Debtor. From that amount Counsel paid Marcia Gazoorian, an experienced bankruptcy paralegal, \$1,000.00 to assist in the preparations of Debtors’ petition, schedules, statements and *First Proposed Plan*. Debtors also tendered \$281.00 for the Court filing fee.
3. Counsel provides the following in conformance with the provisions of MLBR 2016-1:
  - a. A copy of the agreement reciting the terms and conditions of employment and compensation is set forth as **Exhibit 1**. The Agreement provides for additional compensation to be charged for additional services as set forth in Section II.

- b. A contemporaneous detailed time record describing the additional specific services performed each day by each person in the form of a monthly *Itemization* is attached here as **Exhibit 2**. A summary is attached as **Exhibit 2-A**.
- c. **Exhibit 2-A** shows that Counsel devoted a total of 22.6 hours to matters included in the flat fee charged, having a value of \$7,345.00, in addition to the time devoted to the matter by Ms. Gazoorian, and that his assistant Janet Tavano devoted .75 hours.
- d. **Exhibit 2-A** shows that Counsel devoted a total of 59.70 billable hours to matters concerning additional services as set forth in Section II of the *Chapter 13 Retainer Agreement*, **not** including the defense of the adversary proceeding filed by attorneys Champagne and Levine-Piro on behalf of the Barbeaus, and that his assistant Janet Tavano devoted 16.20 hours to such Section II matters.
- e. **Exhibit 2-A** shows that Counsel devoted a total of 103.60 hours to the defense of the Barbeaus' adversary proceeding (Adv. Pro. 13-04026) and that his assistant Janet Tavano devoted 10.00 hours to matters related to the defense of the Barbeaus' adversary.
- f. **The date and amount of retainers received and disbursements to date:**
  - \* On January 24, 2013, Counsel received \$7,500.00 from the Debtors, which was deposited into his IOLTA account.
  - \* On February 26, 2013, \$3,781 was transferred to Counsel's operating account for agreed-upon flat fee of \$3,500 and the Court's filing fee of \$281.00.
  - \* The balance of funds received (\$3,719.00) was earmarked for the anticipated litigation with the Barbeaus.

- \* On March 21, 2014, Counsel received an additional \$500 from Michael Schold to be applied to the defense costs of the Barbeau adversary, and on May 20, 2014, Counsel received an additional \$500 from Mr. Schold. Both checks were deposited into Counsel's IOLTA account.
  - \* On September 5, 2014, Counsel received an additional \$1,500 from Michael Schold to be applied to deposition expenses associated with the defense of the Barbeau adversary, which was also deposited into Counsel's IOLTA account.
  - \* On September 16<sup>th</sup>, Counsel was advised by his bank that the \$1,500 check was returned "NSF"; Counsel was charged a \$15.00 bank fee.
  - \* On September 19, 2014, Michael Schold delivered a replacement bank check in the amount of \$1,500, which was deposited into Counsel's IOLTA account.
  - \* On September 19, 2014, Counsel disbursed \$560.80 to pay McCarthy Reporting Services on their invoice #s 143163 and 143175 for the costs of taking the Barbeaus' video depositions.
  - \* Counsel is presently holding \$5,643.20 in his IOLTA account.
- g. The date and amount of partial or interim payments from the Chapter 13 Trustee:  
**None.**
- h. A narrative of the services provided in this proceeding is set forth as **Exhibit 4**.
- i. In accordance the provisions of MLBR 2016-1(a)(1)-(2), a Summary Chart containing the full names and brief biographies of attorneys and paralegal performing services to the Debtor is annexed as **Exhibit 5**.
4. On September 17, 2014, this Court entered an Order dismissing the Chapter 13 Case "due to the Debtors' failure to file operating reports for their business" on a motion filed by Creditors Arthur Barbeau and Elizabeth Barbeau to dismiss case for abuse.

In their *Opposition to the Motion to Dismiss*, the Debtors had argued that dismissal of the Scholds' bankruptcy case was not in either the Barbeaus' or the Scholds' best interests. A two day trial was scheduled to begin before this Court in less than eight weeks, and the parties had completed discovery pursuant to this Court's *Amended Pre-Trial Order*.

5. Philip M. Stone, Esq, requests that compensation be allowed in the sum of \$55,692.50 for additional services rendered by him and his staff during the period covered by this *Application* (February 4, 2013, through September 30, 2014), plus costs of \$662.56, itemized as follows:

a.	Section II legal services (59.70 billable hours @ \$325 p/hr)	\$19,402.50
	Section II legal services - Legal Assistant	
	(16.20 hours @ \$100 p/hr)	1,620.00
b.	Section II legal services - Defense of Barbeau Adversary Proceeding	
	(103.60 billable hours @ \$325 p/hr)	\$33,670.00
	Legal Assistant (10.00 hours @ \$100 p/hr)	<u>\$1,000.00</u>
		\$55,692.50
c.	Expenses incurred (see spreadsheet attached as <b>Exhibit 3</b> )	<u>\$662.56</u>
	<b>Total:</b>	<b>\$56,355.06</b>

6. The fees and expenses, if allowed, shall be paid by:

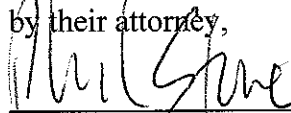
— Amended Plan

— Outside the Plan

**X** Other: Describe: *From funds held in Counsel's IOLTA account, and by the Standing Chapter 13 Trustee.*

7. I hereby state that the compensation and fees and allowance herein claimed belongs wholly to me and will not be divided, shared or pooled, directly or indirectly with any other person or firm.

Respectfully submitted,  
Michael K. Schold and Christine M. Schold  
by their attorney,



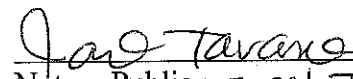
Philip M. Stone, BBO# 544139  
390 Main Street  
Worcester, MA 01608  
Tel. (508) 755-7354  
Fax. (508) 752.3730  
e-mail: pstonelaw@rcn.com

DATED: October 31, 2014

COMMONWEALTH OF MASSACHUSETTS

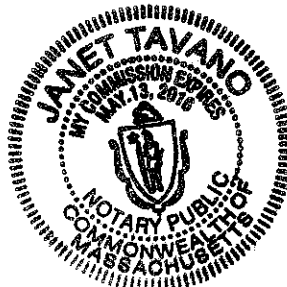
WORCESTER, ss.

On this day before me, the undersigned notary public, personally appeared Philip M. Stone, proved to me through satisfactory evidence of identification, which was a Massachusetts drivers license, to be the person whose name is signed on the preceding or attached documents, and acknowledged to me that he signed it voluntarily for its stated purpose.



Notary Public Janet Tavano

My commission expires: May 13, 2016



**(All Exhibits are Available Upon Request if Not Attached)**

This will confirm the agreement between Michael K. + Christine M. Schold and Philip M. Stone, Esq. ("the Attorney") and sets forth the terms on which the Attorney agrees to represent you as Debtor(s) in the Chapter 13 case you intend to file in the U.S. Bankruptcy Court. The legal fee is \$10,000 <sup>±</sup> plus \$281.00 for Court filing fees. The Debtor(s) is responsible for direct payment of all pre-filing and pre-discharge counseling costs. *It is expressly understood that all sums due must be paid in full before the petition is filed with the Bankruptcy Court.*

*\$7,500 received  
1/19/2013*

**I. The services to be provided include:**


1. General legal advice and assistance concerning debt problems;
  2. Legal advice, preparing and filing of required documents including the petition, and the initial schedules, statements, declarations, matrix of creditors and Plan;
  3. Legal representation at the meeting of creditors pursuant to Section 341
- Additional fees and costs for which you are responsible may include the following:*
- |   |              |
|---|--------------|
| Preparation and recording of Declaration of Homestead:          | \$50.00      |
| Amendments to schedules or matrix of creditors:                 | \$26.00      |
| Preparation, filing and service of Suggestion(s) of Bankruptcy: | \$25.00 each |

**II. Please note that the fee paid is for the services described above, and does not cover any additional legal services, including but not limited to the following matters that may require additional legal services and/or attendance at hearings:**

1. Adversary proceedings brought by or against the Debtor (*see below*);
2. Controversy concerning claimed exemptions;
3. Lien subordination pursuant to Section 506;
4. Claims reviews, and disputed claims either as to status or amount, including creditors seeking relief from the automatic stay;
5. Claims of taxing authorities;
6. Objections to discharge generally or questions as to the dischargeability of a particular debt;
7. Avoidance of judicial liens;
8. The sale of, or re-finance secured by, any property of the estate;
9. The conversion of the case from one chapter of the Bankruptcy Code to another;
10. Amendments to schedules and/or Plan, either pre or post Confirmation, including all communications and pleadings;
11. Review of correspondence and pleadings filed by creditors and interested parties, responses to same, and review of Court Orders;
12. Responses to 11 U.S.C. §707(b) inquiries;
13. Attendance at hearings concerning any Section II matter;
14. "Workouts". The Debtor may request that the Attorney negotiate with one or more creditors either before or during the pendency of a bankruptcy case as part of an effort to either avoid the need to file bankruptcy, or to retain possession of real or personal property.

If such matters occur, the Attorney reserves the right to request an additional retainer against which he may bill at his customary hourly rates. ***The Debtor(s) expressly agree that the Attorney will not enter an appearance or represent the Debtor(s) in any adversary proceeding filed within the bankruptcy case in which the Debtor(s) is a named Defendant unless an additional retainer in the amount requested by the Attorney has been paid.***

  
(Debtor(s) Initials)

  
(Debtor(s) Initials)

If satisfactory arrangements for the payment of any additional fees due cannot be made, the Attorney will withdraw his appearance on your behalf, subject to the approval of the Bankruptcy Court, and will not represent you on these other matters.

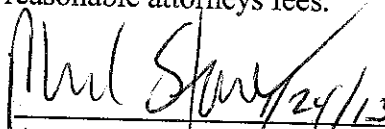
Effective July 1, 2011, the hourly billing rate for the Attorney is \$325.00, and \$100.00 for paralegal services. The Attorney shall notify you by memo of subsequent increases in his hourly rate. You must advise the Attorney in writing within 30 days of the memo date if you object to the increased rate.

When billing you on an hourly basis, the Attorney will periodically send you a statement of reimbursable expenses and an Itemization of his time charges. The minimum unit of billing for services rendered on an hourly basis is one tenth (.1) of an hour. Billable services include court appearances, including travel and waiting time, telephone conferences, telephone calls to and from you, office conferences, legal research, review of file materials and documents sent or received, drafting of pleadings, correspondence and memoranda, and preparation for trials, hearings and conferences. The expenses chargeable against the retainer may include filing fees, deposition expenses, transcript costs, document production and reproducing costs, expedited mail or delivery services, and travel costs.

Once a meeting with the attorney has taken place you are to provide all missing information necessary to file your petition within 60 days of that initial meeting, unless a mutual decision is reached that more time is needed. If you fail to provide the needed information on a timely basis, your file will become inactive and all work will be suspended. In order to reactivate your case, there will be an additional \$100.00 fee charged, and no work will resume and/or your petition will not be filed until all payments due are made in full. In the event your file is suspended and not reactivated, the Attorney shall be entitled to keep all payments made for services rendered to date.

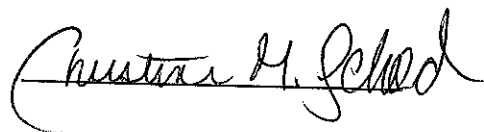
In the event that a Debtor Client decides after the preparation of the petition and related documents *not* to file a bankruptcy case in the U.S. Bankruptcy Court, the attorney shall be entitled to retain as compensation for services rendered the agreed-upon retainer less a credit to the Debtor Client of an amount equal to one hour's billing for the anticipated attendance at the section 341 meeting. All un-disbursed amounts actually paid by the Debtor Client for filing fees and/or credit counseling shall also be refunded to the Client.

If the Debtor(s) fails to pay any additional money owed the Attorney, the Attorney shall be entitled to also recover all costs of collection, including reasonable attorneys fees.

  
Attorney DATE

ACCEPTED:

  
Client(s) Signature(s)



*The Client(s) Acknowledge Receiving a Copy of This Agreement and Discussing its Contents with the Attorney.*

Rev. 09/2012



MATTER

Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
02/04/2013 download and print Notice of Appearance filed by Orlans Moran for Bank of America. Updated Best Case as additional notice party.	0.1	325.00	32.50
02/07/2013 Rev corres from Wells Fargo RE go forward mortgage payment on Pebble Beach Rd property. Says that they are contractually due for 12/1/12. [NB: No, that was pre-petition.] JT to mail copy to clnt.	0.1	325.00	32.50
02/11/2013 TC from Rick Sheils at Bowditch & Dewey, says that Rob Morton contacted him, that Chris Metzger was in midst of foreclosing on property that Mike had said that they would let go. He did not know property address. Gave him my e-mail to send loan file to.	0.2	325.00	65.00
02/12/2013 Download, print and review PoC #1 filed by Howe Lumber for \$45,829.11, and PoC #2 filed by Orlans Moran for BoA/Countrywide on 6 Bill Graham Lane, Millbury. Asserts pre pet arrears due of \$25,668.65. Scanned and e-mailed page one of both PoCs to MG.	0.3	325.00	97.50
02/12/2013 rev e-mail from atty Shiels RE Dresser Hill Road property. Rev'd Registry of Deeds records. e-mail sent to atty Sheils, the reference must be incorrect, asked him to double check.	0.2	325.00	65.00
02/13/2013 Rev e-mail from atty Sheils w/ payoff information on loan with Millbury Savings.	0.2	325.00	65.00
02/14/2013 Download print and review PoC #3 filed by MA DUI. Copy e-mailed to MG.	0.2	325.00	65.00
02/26/2013 Download and print PoC #4 RE Sallie Mae for \$21,915. Download and print assignment of claim (Docket Item #17) to ASA. Download, print and review motion for relief filed by Millbury Savings Bank RE Dresser Hill/Britlee. Per schedules, Property is to be surrendered. Prep, file and serve statement of no opposition w/ c/s (Docket #26).	0.75	325.00	243.75
02/26/2013 TC from atty Rich Sheils. Told him I had filed a statement of no opposition within past hour.	0.1	325.00	32.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL****\$698.75**

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
03/25/2013 TC to atty Alan Margolies RE two PoCs he filed on behalf of American Builders. Told him he didn't check the "amended" box, he says Bankr Crt software would not let him. Gave him language for withdrawal of PoC #5, and offered to review his draft before he files it with the Court.	0.2	325.00	65.00
03/25/2013 Rev e-mail from Christine RE issues in paying CitiMortgage and amnts due to Wells Fargo.	0.1	325.00	32.50
03/25/2013 Rev e-mail from atty Margolies with attached draft of mo to withdraw PoC#5. Edited motion and returned it to him. 2nd e-mail sent.	0.2	325.00	65.00
03/26/2013 Rev and reply to e-mail from atty Margolies RE process for filing Notice of Withdrawal of Claim.	0.1	325.00	32.50
03/26/2013 RC to atty Margolies, says he cannot file withdrawal of #5 through ECF. Walked him through pull down menus to Claim Actions / Withdrawal. Rev'd Claim Register, both claims appear. Gave him Paula's direct dial #.	0.2	325.00	65.00
03/26/2013 Rev JT's 1st draft of objection to PoC #9 filed by Wells Fargo. Is OK to file.	0.1	325.00	32.50
3/26/13 - Prepare draft Objection to Proof of Claim #9 filed by Wells Fargo	0.5	100.00	50.00
3/26/13 - Prepare objection to Claim # 9 in final, file with Court and mail to service list.	0.25	100.00	25.00
03/27/2013 Rev Crt Order on withdrawal of PoC #5, hearing has been canceled, updated Calendar. Download, print and review PoC #10 filed by Millbury Savings Bank by Rick Sheils. There is no total claim amount stated, nor an arrears amount. Will need follow up. Sent copy of Crt Order to Christine via e-mail.	0.3	325.00	97.50
03/28/2013 Download, print and review PoC #11 filed by National Grid. No accounting is attached. Rev e-mail from Christine, with attached response from Mike to the allegations set forth in the motion for relief from stay	0.3	325.00	97.50
03/29/2013 Draft response to Barbeau mo for relief from stay, file and serve. e-mailed Docketed Copy to Christine.	2.75	325.00	893.75
03/29/2013 Download, print and review Affidavit of Melissa a. Levine-Piro, Esq.	0.2	325.00	65.00

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**TOTAL** \$2,868.75

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
03/04/2013 rev PoC #5 filed by atty Alan Margolies for American Builders for \$8,677.13. We scheduled debt at \$5,058.30. No itemization attached to PoC filed, instructed JT to prepare objection.	0.2	325.00	65.00
03/05/2013 Rev and edit JT's 1st draft of objection to claim #5.	0.1	325.00	32.50
03/05/2013 Review scheds B and C, create spreadsheet as to (d)(5) exemptions taken. Mike exceeds the permissible amount, e-mail sent to MG.	1	325.00	325.00
3/5/13 - Prepare draft Obj to Claim #5. Review w/PMS.	0.5	100.00	50.00
3/6/13 - Prepare obj to Claim # 5 in final form making changes to Certificate of Service, File with Court and mail copies to interested parties.	0.5	100.00	50.00
03/06/2013 RC from Joanne, she will file mo to extend Ttee.'s deadline to object to Plan and claimed exemptions until May 31st, so that tax returns can be filed by 4/15/13.	0.1	325.00	32.50
3/6/13 - Prepare DSO and letter to client to review and sign DSO and return to this office to file with Court.	0.5	100.00	50.00
03/11/2013 Download, print and review PoC #6 filed by BoA on Bill Graham Lane.	0.1	325.00	32.50
03/11/2013 Rev corres from Wells Fargo re go-forward post petition mortgage payments on 10 Pebble Beach Rd. Instructed JT to send copies to clnts, and to update BestCase w/ requested address in San Antonio, TX.	0.1	325.00	32.50
03/12/2013 Download notice of hearing RE objection to claim of American Builders & Contractors Supply, Inc, confer w/ JT RE diarying, service and prep of c/s.	0.1	325.00	32.50
3/12/13 - Prepare draft Notice of Hearing re obj to claim #5, review w/PMS, prepare in final, file with Court and mail copy to interested parties.	0.75	100.00	75.00
03/13/2013 Download and print PoC #7 filed 3/12/13 by atty Alan Margolies on behalf of American Builders. This is the same creditor that filed PoC #5, to which an objection was filed. PoC #7 does not indicate it amends #5. Attached is an Execution issued 1/23/13 in the amount claimed, c. 13 case was filed 1/24/13	0.3	325.00	97.50
03/14/2013 TC from Alisha at BoA, wants to discuss authorization to speak directly w/ Debtors RE options. Told her that Bill Graham Lane had been scheduled to be surrendered, and that further communication was not necessary. She said she was not aware that property was to be surrendered.	0.1	325.00	32.50
03/15/2013 Download and print Order granting mo of Millbury Savings Bank for relief from stay.	0.1	325.00	32.50
3/18/13 - scan DSO and Amended 22 C, file with Court.	0.5	100.00	50.00
03/22/2013 Rev PoC #9 filed by Wells Fargo RE 10 Pebble Beach. Asserts pre-pet arrears of \$7,397.83. States claim amnt is \$419,605.14, no FMV is stated. We scheduled a value of \$350,000. This is "A Certain Loan" as defined by MGL c. 244 sec 35B, which requires analysis of feasibility of modification.	0.3	325.00	97.50
03/22/2013 Download, print and review motion for relief filed by atty for Barbeaus seeking leave of the Bankruptcy Court to return to the Superior Court for an assessment of damages hearing. The Superior Court orders attached as Exhibits refer to a hearing held 1/29/2013, which is AFTER the bankruptcy petition was filed. Rev'd WP, Suggestion of Bankruptcy was sent to Superior Crt on 1/25/13, and to Plntff's atty of record. The Bankr Court Order says that Objections to the motion are due by 04/3/2013, however the hearing is scheduled for 4/2/2013 at 10:00 AM. copy of motion e-mailed to Christine w/ request that they review over the weekend and to call PMS.	0.5	325.00	162.50
03/23/2013 Rev letter from atty Margolies RE American Builders claim. Rev PoC #5. Problem is that he failed to check box indicating that #7 amends #5. Rev letter from CitiMortgage RE Waters St. Claims it is past due post petition. Scanned letter and forwarded it to Christine via e-mail.	0.3	325.00	97.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL**

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
04/02/2013 Crt appearance for hearing on Barbeau's motion for relief from stay. After argument, motion was denied. e-mail sent to Christine.	0.7	325.00	227.50
04/02/2013 Review e-mail of thanks from Christine. Replied with detailed explanation of what possible next steps to expect. Retrieved deadlines for filing of objection to discharge [4/30/13] and deadline for non-governmental entities to file proofs of claim [5/30/2013], and included them in e-mail to Christine.	0.3	325.00	97.50
4/2/13 - prepare Notice of Hearing on Obj to Claim #9, file with Court and mail to interested parties.	0.5	100.00	50.00
04/03/2013 Download, print and review Notice of Appearance filed by atty David Silverman on behalf of creditor J & E Electric Company, Inc.	0.1	325.00	32.50
04/04/2013 Download, print and review two PoCs filed by atty David Silverman. #12 has is for half of amnt scheduled.	0.2	325.00	65.00
04/10/2013 Download, print, and review motion of atty Melissa A. Levine Piro to appear pro hac vice, and aff in support. Rev Crt Order of fees owed.	0.3	325.00	97.50
04/10/2013 Download print and review PoC #14 filed by Town of Oxford RE unpaid real estate taxes owed.	0.1	325.00	32.50
04/17/2013 Download, print and save Order allowing mo of atty Levine to appear Pro Hac Vice, copy e-mailed to Christine, also advised that the last day for creditors to oppose dischargeability is April 30th.	0.3	325.00	97.50
04/17/2013 Download, print and review PoC #15 filed by PRA as assignee of Capital One Bank. Added Capital One as additional notice party, updated amnt of claim.	0.2	325.00	65.00
04/24/2013 TC from Christine, discussed her concern RE Barbeaus, explained steps of them filing a claim, objections, etc. and that determining claim amount was a separate issue from objecting to Discharge. Discussed issue of outstanding attachment from motorcycle case, she will follow up w/ atty.	0.3	325.00	97.50
04/25/2013 Download, print and review \ #16, filed by Nadine Champagne for Barbeaus.	0.3	325.00	97.50
04/26/2013 Download, print, save and review adversary complaint. forwarded it and PoC to Christine via e-mail.	0.3	325.00	97.50
04/26/2013 Rev and reply to e-mail from Christine RE mtg next week late PM.	0.1	325.00	32.50
04/29/2013 Confer w/ clnts RE PoC and adversary complaint filed by Barbeaus. It will take about two weeks for them to gather docs and prepare chronology sufficient to respond.	1	325.00	325.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$1,415.00

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
05/01/2013 Confer w/ MG RE attachment, she will speak to Marshall Gould RE title standards. Schold Builders does not own any real property.	0.2	325.00	65.00
08-41266 Download and print PoC #17 filed by B & L for Amer Exp.	0.1	325.00	32.50
05/06/2013 Download, print and save amended complaint filed by atty Champagne, copy e-mail to Christine	0.3	325.00	97.50
05/06/2013 Download, print and review PoC #18 filed by PRA as assignee of GE Capital Retail Bank, was originally a Walmart card. Confer w/ JT RE updating Best Case.	0.1	325.00	32.50
05/06/2013 rev and reply to MG's e-mail RE applicable title standards to attachment against Schold Builders.	0.2	325.00	65.00
5/14/13 - prepare authorization for Wells Fargo to speak to debtors directly, faxed to Wells Fargo	0.4	100.00	40.00
05/20/2013 RC to atty Joseph Dolben RE tomorrow's scheduled hearing on debtors' objection to PoC #9, filed by Wells Fargo. Page 4 of 28 of Claim #9 says that the debt was incurred on Jan. 29, 2013. The Debtors' petition was filed on Jan. 24th, LM on his VM. e-mail sent to atty Dolben, rev'd his reply. Says date may be in error, he wants to continue hearing to discuss filing and amended PoC w/ his client. Confer w/ JT RE prep of motion to continue. Rev e-mail from Dolben w/ proposed draft of jt mo to continue. Told JT not to prep motion. Replied to e-mail w/ requested edits.	0.5	325.00	162.50
05/20/2013 Rev Crt Order. Hearing on Obj to Wells Fargo PoC is continued to 07/09/13 at 10:30AM. Update Calendar.	0.1	325.00	32.50
05/21/2013 Download, print and review PoCs #19 American Express and #20 Lawn Barber, Inc./Phaneuf Associates.	0.2	325.00	65.00
05/28/2013 Download, print and review Notice of Appearance filed by Timothy Larson/Orlans Moran for Nationstar Mortgage. Rev'd Sched D, Nationstar is not a scheduled creditor, but Orlans Moran is listed as an additional notice party on the home equity line of credit on 6 Bill Graham Lane, Millbury, MA ; the single family house to be surrendered. BoA is scheduled as the creditor.	0.2	325.00	65.00
05/28/2013 Rev Notice of Mortgage payment change filed by BoA dtd 4/5/13. Does not reference property address, account number does not match BestCase scheds.	0.1	325.00	32.50
05/30/2013 Download, print and rev PoC #21 filed by Nationstar Mortgage LLC as assignee of BAC/Countrywide RE 689 Main Street, Oxford. Claim amnt is slightly higher than scheduled. Claims 5 months arrears on mortgage plus escrow shortage.	0.3	325.00	97.50
05/31/2013 Download and print notice of transfer of PoC #2 from BoA to Green Tree. This is on Bill Graham Lane, which is to be surrendered.	0.2	325.00	65.00
05/31/2013 Download, print and review c. 13 Ttee.'s Obj to Plan Confirmation, says that ME snowmobiling cabin is a luxury, and that MS should not be subsidizing amnt of diff between actual expense and income rec'd. Copy e-mailed to Christine	0.3	325.00	97.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$950.00

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
06/03/2013 TC w/ Christine RE Ttee.'s objection. She will speak to Michael about getting the 4-5 guys who share the expenses to pitch in more, so there is no net cost to the estate for the property in Maine. Says that she is still living in house on Bill Graham, that BoA has done nothing to proceed with foreclosure. Discussed Barbeau claim and possible counterclaim. Christine says they expected to make a \$150k profit on the house over two years, that their cash flow problems were exacerbated by the real estate attachment that was placed on all of their property preventing them from taking out equity or refinancing. Claim was eventually settled for the policy limits after their accident reconstruction expert wrote a report saying that the 72 y/o operator of the motorcycle had enough time and distance to stop and control his bike, and that his age may have delayed his reflexes.	0.4	325.00	130.00
06/04/2013 Download, print and review PoC #22 filed by CitiMortgage. This is a late filed claim. Download, print and review notice of change in mortgage payment from BoA RE Claim #6. Confer w/ JT RE status of Claims Summary.	0.3	325.00	97.50
06/06/2013 Download and print notice of response deadline/hearing on Debtors' Objection to Claim 22 of Claimant CitiMortgage, Inc. Confer w/ JT.	0.1	325.00	32.50
06/06/2013 RC to Christine at 3.10 PM, LM w/ best times to c.b. today and tom.	0.1	325.00	32.50
06/07/2013 TC from Chris, answered her ?s RE ME property, student loan payments, application of post pet mortgage payments.	0.4	325.00	130.00
6/7/13 - Prepare Notice of Hearing on Obj to POC #22, file with Court and mail to interested parties.	0.5	100.00	50.00
06/07/2013 Rev JT's 1st draft of Notice of Hearing and c/s RE Objection to Claim	0.1	325.00	32.50
06/17/2013 Rev Crt Order RE c. 13 Ttee.'s Obj to Confirmation. Added deadline to Task list.	0.1	325.00	32.50
06/19/2013 Prepare objection to claim, edit, file. Confer w/ JT RE Notice of Objection and service. Draft motion to strike Adversary Complaint	4.5	325.00	1,462.50
06/20/2013 Download, print and review PoC #23 and attachment. Claim is for \$77,448.93 for student loan. Instructed JT to file objection as late filed.	0.2	325.00	65.00
06/20/2013 Rev JT's 1st draft of obj to Nelnet claim for US Dept of Educ. Suggested edits, Rev'd final draft. Discussed c/s, OK'ed it to file.	0.2	325.00	65.00
6/20/13 - Prepare Obj to POC #23 filed by Nelnet on behalf of US Dept of Education, file with Court and mail to interested parties.	0.5	100.00	50.00
06/24/2013 Rev corres from CitiMortgage RE post pet payments in arrears. No property address provided confer w/ JT.	0.1	325.00	32.50
06/24/2013 Rev Notice of Post Petition Mortgage Payment Change from BoA. No address specified, may be Bill Graham [to be surrendered].	0.1	325.00	32.50
6/25/13 - Prepare and send letter to clients with copy of letter from CitiMortgage re mortgage payments for 30 Waters Street, Millbury, MA	0.3	100.00	30.00
06/28/2013 Download and print Notice of Hearing [2] on Objections to Claims. Confer w/. JT RE prep of notice and service.	0.1	325.00	32.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$2,307.50

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
7/2/13 - Prepare draft Notice of Hearing on Obj to POC #23 and draft Notice of Hearing on Obj to POC #16.	0.8	100.00	80.00
06/28/2013 TC from atty Joe Dolben representing Wells Fargo Bank, wants to continue tomorrow's scheduled hearing. Suggested that he call Steve Reynolds to determine next available date. Rev e-mail from him w/ attached proposed mo to continue, has incorrect date. Replied to e-mail w/ comment RE date and gave assent to file motion.	0.3	325.00	97.50
07/08/2013 rev PoC filed by MDOR for 2012 estimated income taxes. Per JT, her Task list has been waiting for clnts to provide. Instructed her to send copy of PoC to clnts w/ cvr letter.	0.1	325.00	32.50
7/8/13 - prepare final Notice of Hearing on Obj to POC #23 and Notice of Hearing on Obj to POC #16, file with Court and mail to interested parties.	0.8	100.00	80.00
7/10/13 - Prepare and send letter to clients with copy of POC filed by MDOR re estimated 2012 income taxes. Request a copy of 2012 tax returns.	0.3	100.00	30.00
07/11/2013 Status review. TC to c. 13 Ttee. RE deadline to file amended plan. Spoke to Leo, transferred to Joanne's VM. LM asking for c.b. to discuss coordinating extension of deadline to file amended Plan w/ objection to Barbeau claim. Rev PACER docket, hearings on 3 objections to PoC are scheduled for 8/20/13. Updated calendar.	0.3	325.00	97.50
07/12/2013 TC from Joanne Psilos RE dead;line to file amended Plan and August 20th hearings on claims objections. She suggests filing mo to extend to 9/6/13, by then the Crt will have consolidated Barbeau adv/claims objection, and we can proceed from there. Draft and file expedited mo to extend Deadline to File Amended Plan. Confer w/ JT RE service by 1st class mail per c/s.	0.5	325.00	162.50
07/12/2013 Download and print Crt Order allowing mo to extend. Update Task list	0.1	325.00	32.50
07/31/2013 Download, print and review notice of appearance by atty Marcus Pratt of Korde & Associates for CitiMortgage, Inc. RE 30 Waters St., Millbury. Download and print CitiMortgage's Response to Objection to Claim.	0.3	325.00	97.50

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**TOTAL** \$710.00

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
08/12/2013 Download, print and review Barbeau response to objection to PoC.	0.3	325.00	97.50
08/16/2013 TC from atty Joe Dalton RE obj to Wells Fargo claim. Told him I wd c.b. this PM, his direct dial # is 401.234.4522.	0.1	325.00	32.50
08/16/2013 Rev calendar for Tues. hearings, set up separate files for each of three claims objected to. Nelnet and Citi were late filed. Wells Fargo has claim for an escrow shortage incurred AFTER case was filed, is not a pre-pet claim. 4th claim is Barbeau which is the subject of an adversary proceeding. Rev reported cases, in c. 13 Court late filed claims must be disallowed, Crt can only enlarge the deadline as per Rule 3002(c), which lists six instances in which a Court may extend a deadline. "The Court has no discretion to allow a late filed proof of claim." Rev sec 502(b)(9).	0.8	325.00	260.00
08/19/2013 Reply to e-mail from atty Dolben. draft file and serve withdrawal of objection to PoC #9. File and serve, copies mailed to Christine and Mike.	0.5	325.00	162.50
08/19/2013 Download, print and review Crt Order RE withdrawal of Obj to PoC #9 (Wells Fargo).	0.1	325.00	32.50
08/19/2013 Complete preparations for and attend Crt hearings on Objections to Claims. In open Crt. CitiMortgage withdraws its response, Objection is Sustained. Objection to Nelnet claim for \$77k is Sustained. Objection to Barbeau claim is to be consolidated with Adversary Proceeding, Pre-Trial Order to issue. Advised Crt that Objection to Amended Complaint was Moot, 2nd Amended Complaint has been filed, and Answer/Counterclaim filed. Download and print Crt Orders upon return to office. e-mail w/ attached copies sent to Christine, added Pre-trial hearing date to calendar	1	325.00	325.00

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**TOTAL** \$910.00



MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
09/05/2013 Rev VM msg from Denise RE claims objections. RC to her, went over each claim, and Crt.'s action. She will assent to motion to extend deadline to file amended Plan.	0.2	325.00	65.00
09/05/2013 Draft, file and serve Emergency Assented To motion to extend deadline to file amended Plan.	0.5	325.00	162.50
09/05/2013 RC to atty Champagne, discussed merits of claim and if whether attachment was deemed invalid, how treatment as an unsecured claim wd affect ability to be a c. 13 case. Discussed title issues, she will send e-mail to PMS.	0.2	325.00	65.00
09/06/2013 Download and print Crt. Order Allowing motion to extend deadline to file amended Plan. Updated Task list deadline.	0.1	325.00	32.50
09/27/2013 Download and print Notice of Mortgage Payment change from BoA. No property address provided. Confer w/ JT, per BestCase no BoA acct on D matches last four digits on Notice. instructed her to contact BoA using e-mail provided.	0.1	325.00	32.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$357.50

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
10/21/13 - Prepared draft letter to clients looking for 2012 income tax returns.	0.2	100.00	20.00
10/21/13 - prepare and send letter to Michael and Christine looking for their 2012 income tax returns.	0.3	100.00	30.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$50.00

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
12/03/2013 Status review. TC to Joanne Psilos, left very detailed msg that current deadline to file amended plan is this Fri, but that Boroff has scheduled evidentiary hearing for next May 22nd.	0.1	325.00	32.50
12/03/2013 download, print and review Notice of Appearance and Request for Notice filed by Richard T. Mulligan for Creditor Nationstar Mortgage LLC. Per D, Nationstar does not appear. e-mail sent to R. Mulligan requesting property address.	0.2	325.00	65.00
12/03/2013 e-mail exchange w/ R. Mulligan and Jason Giguere RE Appearance they field on behalf of Nationstar. Per Jason, it was a BoA account. Replied to him asking if Orlans Moran was no longer in the picture.	0.3	325.00	97.50
12/03/2013 RC from Joanne Psilos, is OK to extend deadline to file amended Plan to June 30th. Discussed options re settlement, see notes.	0.2	325.00	65.00
12/04/2013 Draft, file and serve Assented to Expedited Motion to Extend Deadline to File Amended Plan. Confer w/ JT RE 1st class mail service.	0.3	325.00	97.50
12/04/2013 Download, print and serve Withdrawal of Appearance by R. Mulligan/Harmon on behalf of Nationstar.	0.1	325.00	32.50
12/4/13 - Prepare Supplemental Certificate of Service re Debtors' Motion to Extend Deadline to File Amended Plan and file it with Court. Mail copies of Motion to parties listed on Supplemental COS	0.4	100.00	40.00
12/05/2013 Download, print and review Claims Register. Print BestCase summary of claims as schedule. See notes as to status of objections [4]. Two were sustained, Barbeau was consolidated w/ adversary [but secured claim reclassified to unsecured], and no action appears on Claims register as to Obj to PoC #9 filed 3/26/13, will need to research	0.4	325.00	130.00
12/05/2013 TC from Christine. Says that they need a new accountant, that 2010 and 2011 returns need to be amended. They accounted for custom build house as if it were a sub division, which is incorrect. Should have reported income/expenses annually, not at end of project. Gave her Brenda's Bianculli name to call. Told her that anticipated tax liability could be included in amended Plan. [balance of TC billed to adversary - .5 is total time]	0.3	325.00	97.50
12/05/2013 Rev e-mail/fax from Orlans Moran on behalf of Nationstar alleging that no payments on 689 Main St. Oxford have been paid since June, 2013. Rev'd BestCase, this was scheduled as a BoA mortgage. Copy e-mail to Christine with request that she call to discuss response.	0.3	325.00	97.50
12/06/2013 Forward Brenda Bianculli's contact information to Christine. Rev PACER as to status of expedited mo filed to extend. No Crt. action yet per docket.	0.1	325.00	32.50
12/09/2013 TC from Christine, says she thought they were five months in arrears, told her letter included Dec. payment due. She will try to make a 3 month payment tonight, and will send PMS a proposal to double up for the balance owed.	0.1	325.00	32.50
12/10/2013 Rev e-mail from Christine RE Nationstar arrears. Draft and send e-mail to Alisha Williams at Orlans Moran.	0.2	325.00	65.00
12/11/2013 Status review. Per PACER, still no Crt. action on mo to extend deadline to file amended Plan.	0.1	325.00	32.50
12/26/2013 Download and print Crt. Order allowing mo to extend deadline to file amended Plan. Update Task list.	0.1	325.00	32.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$950.00

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
1/16/14 - prepare draft Notice of Change of Address for Michael to correct his address with Court, review w/PMS and file with Court.	0.5	100.00	50.00
1/17/14 - prepare and send letter to both debtors with copy of letter from CitiMortgage informing of transfer of mortgage to Seterus.	0.5	100.00	50.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$100.00

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
02/03/2014 Rev e-mail response from atty Champagne	0.1	325.00	32.50
2/4/14 - prepare and mail letters to Michael and Christine Schold with copy of modification proposal from Wells Fargo re 10 Pebble Beach Rd., Webster, MA	0.4	100.00	40.00
02/06/2014 1st review of corres from Denise Pappalardo w/ copies of letter from atty Champagne w/ MA RMV printout. Confer w/ JT RE identifying items in dispute, and review of MG's file notes. JT to prep 1st draft of letter	0.5	325.00	162.50
2/6/14 - review list of unscheduled assets and compare to debtors' schedule B. look through files for value of Harley Davidson and information on boats scheduled on B. Review with PMS	0.5	100.00	50.00
2/6/14 - prepare draft letter to Scholds re letter from ch 13 Trustee re allegations of unscheduled assets.	0.4	100.00	40.00
02/07/2014 Confer w/ JT RE prep of chronology of events. Two vehicles not scheduled ere not disclosed by client to MG. Skeleton petition was filed, and then balance of schedules. After docs were sent to c. 13 Ttee Leo called w/ ?s about which insurance policies covered which property. JT [it was initially MG's file] then contacted insurance agent for addit info. One coverage sheet provided listed two vehicles not scheduled. Janet has a note on faxed rec'd.	0.2	325.00	65.00
02/07/2014 Rev and edit JT's 1st draft of letter to clients RE allegations of unscheduled assets.	0.2	325.00	65.00
2/7/14 - make change to letter to clients re unscheduled assets. Mail to both debtors.	0.3	100.00	30.00
2/7/14 - review file and time entries. Prepare chronology of events re personal property listed on schedule B	0.5	100.00	50.00
02/12/2014 Confer w/ atty Roy Bourgeois RE professional responsibilities in light of allegations of failure to disclose assets.	0.2	325.00	65.00
02/12/2014 Confer w/ JT, prepare summary of alleged unscheduled items. RC to Michael, went over list. See notes. TC to D. Pappalardo, left detailed msg stating that three items were acquired post-filing, that boat was scheduled under manufacturer's name, that two Seadoos were inoperable and would cost to dispose of.	0.8	325.00	260.00
02/12/2014 Download, print and review Notice of Transferred Claim to Fannie Mae.	0.1	325.00	32.50
02/14/2014 RC to Denise Pappalardo. went over each alleged "un-scheduled" vehicle. She suggests that response be in the form of an affidavit.	0.2	325.00	65.00
02/14/2014 Begin prep of Aff for Michael RE "unscheduled" assets. TC from Christine, discussed logistics of forwarding draft Aff for completion. Confer w/. JT RE MG' s methodology to value Harley, edited Aff. e-mail sent to Christine.	1.5	325.00	487.50
02/14/2014 Confer w/ JT RE Wells Fargo modification proposal, she will follow up.	0.1	325.00	32.50
02/14/2014 TC w/ Wells Fargo rep RE modification. She wants PMS to file for Crt approval based upon letter sent. Confirmed her mailing address for service purposes.	0.2	325.00	65.00
02/18/2014 Prep mop to approve mortgage modification agreement, scan and attach exhibit. TC to Paula in S'field Bankr Crt., LM. File via ECF. Confer w/ JT RE service	1	325.00	325.00
02/18/2014 Status review, follow up e-mail sent to Christine RE addit info needed to complete Aff sent to her this past Friday.	0.1	325.00	32.50
02/19/2014 Rev e-mail w/ edits to Aff. Revise Aff and return to Chris.	0.3	325.00	97.50
02/19/2014 TC from Michael, say that he will be in around 1.30 PM to sign the Affidavit. Draft cover letter to Denise Pappalardo.	0.3	325.00	97.50
02/19/2014 Confer w/ Michael, rev'd and executed Aff. Discussed his ? RE incorporating, says that one of his trucks was involved in a minor accident yesterday. He is concerned about personal liability even though he has \$1m in liability coverage.	0.2	325.00	65.00
02/25/2014 download and print Notice of Appearance filed by Richard Mulligan/Harmon for Green Tree.	0.1	325.00	32.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$2,192.50

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
03/07/2014 Download, print and save Order allowing mo to modify mortgage. Copy e-mailed to Christine, confer w/ JT RE forwarding copy to mortgage servicer.	0.2	325.00	65.00
3/7/14 - prepare and send letter to Wells Fargo with copy of Court Order allowing Mo/approve Loan Modification.	0.3	100.00	30.00
03/19/2014 Confer / JT RE mort modification docs rec'd from Wells Fargo. We have Crt. approval now, just need clnts' signature.	0.1	325.00	32.50
03/20/2014 rev JT's 1st draft of letter to clnts RE mortgage modification. Instructed her to send original docs to Christine	0.1	325.00	32.50
3/21/14 - prepare and send letter to Christine Schold with modification packet from Wells Fargo and copy of Court Order approving the modification.	0.3	100.00	30.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$190.00

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
4/2/14 - prepare draft letter to clients with copy of new mortgage payment notice from Seterus	0.3	100.00	30.00
4/7/14 - prepare and send letters to Michael Schold and Christine Schold sending them each a copy of the New Mortgage Payment Notice and Escrow Account Disclosure Statement from Seterus re 30 Waters Street.	0.4	100.00	40.00
04/10/2014 RC to Christine, says that amended tax returns show a \$70k tax liability. Discussed sources of income subject to Tax, options to address thru amended Plan. She will drop of addit docs today.	0.3	325.00	97.50
04/11/2014 rev notice of mortgage payment change from Seterus. No ref as to property address is given, acct # does not match any on Sched D. Confer w/ JT.	0.1	325.00	32.50
04/25/2014 Download, print and save mo for relief filed RE 6 Bill Graham. Is scheduled to be surrendered. copy e-mailed to Christine	0.2	325.00	65.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$265.00

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
05/02/2014 rev and edit JT's 1st draft of letter to clnts re need to provide monthly income/expense report to c. 13 Ttee, and to provide copies of 2013 tax returns.	0.1	325.00	32.50
5/2/14 - prepare and send letter to clients re monthly reports to chapter 13 trustee.	0.3	100.00	30.00
05/13/2014 Download and save Order granting relief RE Bill Graham Lane. Copy forward to Christine	0.1	325.00	32.50
05/16/2014 TC from Christine, says that she and Michael are not going to be living together. Told her she did not need to vacate Bill Graham immediately. Says she has found a place to rent effective July 1st, knows the owner.	0.1	325.00	32.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$127.50



MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
06/11/2014 Rev corres [4] from Seterus requesting cints' SSN's. Confer w. JT RE follow up.	0.1	325.00	32.50
6/12/14 - prepare letters to Michael Schold and Christine Schold enclosing letter and W-9 from Seterus for each of them to sign and return to this office.	0.5	100.00	50.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$82.50

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
07/08/2014 Confer w/ JT RE TC from Crt RE need to file amended Plan.	0.1	325.00	32.50
07/08/2014 TC w/ Joanne Psilos RE extension of deadline to file Amended Plan. OK to extend to 12/15/14 per Denise. Replied to e-mail from Katie Leas at BK Crt.	0.3	325.00	97.50
07/09/2014 Prep, file and serve mo requesting extension of time to file an amended Plan to December 15, 2014. Hard copy mailed to Citi, e-mail sent w/ copy to Christine. Also asked her to have Michael call to discuss scheduling the taking of his deposition by atty Champagne.	0.4	325.00	130.00
7/18/14 - prepare and send follow up e-mail to Christine Schold about scheduling date and time to review and sign deposition.	0.1	100.00	10.00
07/18/2014 TC w/ Christine RE implications and process for severing her case and converting her case to c. 7. She will call back early next week.	0.1	325.00	32.50
7/21/14 - receive e-mail from Christine re PMS availability for Thursday afternoon to go with her to review depo transcript. Replied that PMS is meeting with Mike Schold Thursday afternoon to prepare for his depo. Gave her other dates PMS is available.	0.1	100.00	10.00
07/28/2014 Rev req for proof of insurance coverage RE 620 Main St. Millbury, confer w/ JT RE follow up w/ clnt.	0.1	325.00	32.50
7/28/14 - prepare and send letter to Seterus with W-9 Forms signed by Michael and Christine.	0.3	100.00	30.00
07/29/2014 Download and Print Order extending deadline to file an Amended Plan, update Task list dates	0.1	325.00	32.50
07/29/2014 Rev and edit 1st draft of letter to Christine w/ enclosed copy of corres from Seterus RE insurance bill needed to pay out of escrow.	0.1	325.00	32.50
7/29/14 - prepare and send letter to Christine Schold with letter from Seterus looking for hazard insurance bill.	0.3	100.00	30.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$470.00

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
08/20/2014 rev and edit 1st draft of letter to clnts RE their need to provide proof of insurance and monthly operating reports to c. 13 Ttee.	0.2	325.00	65.00
8/20/14 - prepare and send letters to Michael and Christine Schold following up on our letters to them dated 5/2/14 and 7/29/14.	0.3	100.00	30.00
08/27/2014 TC from atty Champagne, says that she will be filing a motion to dismiss or convert case.	0.1	325.00	32.50
08/27/2014 Download and print atty Champagne's motion to dismiss or convert, saved and sent via e-mail to Christine.	0.2	325.00	65.00
08/28/2014 Download and print notice of hearing RE mo to dismiss, added to Calendar.	0.1	325.00	32.50
08/28/2014 e-mail sent to Christine to re schedule Tel conf.	0.1	325.00	32.50
08/29/2014 TC from Christine, says that they have another accountant who is working on the reports for the c. 13 Ttee. Advised her that hearing on motion to dismiss has been set for 9/17/14.	0.1	325.00	32.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$290.00

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
09/02/2014 rev e-mail from Christine w/ attached doc evidencing proof of insurance on 30 Waters Street Millbury. Forwarded it to JT w/ instruction to follow up w/ servicer that requested doc.	0.1	325.00	32.50
09/02/2014 rev and OK 1st draft of letter to Seterus RE insurance coverage on Water St. Mill bury property. Policy period begins 8/1.	0.1	325.00	32.50
9/2/14 - prepare and send letter to Seterus with hazard insurance info for 30 Waters Street property.	0.3	100.00	30.00
09/11/2014 Begin prep of opposition to mo to dismiss [12.45 ->. Reviewed and replied to e-mail from Christine w/ attached e-mail exchanges between attys Trudell and Levine Piro, saved as a .pdf file. Confer w/ JT RE obtaining copy of transcript of Michael's deposition. Pr JT, they will e-mail it to PMS. Continue prep of response/opposition. Rev e-mail from Flynn Reporting w/ attached transcript of Michael's deposition.	2.5	325.00	812.50
09/12/2014 Continue prep of Opposition to Motion to Dismiss	1.5	325.00	487.50
09/15/2014 Rev e-mail from Christine / attached Aff from Michael, and reply. Complete drafting opposition to motion to dismiss c. 13 case. Confer w/ JT RE numbering and scanning of exhibits.	6.5	325.00	2,112.50
09/16/2014 Final edits, confer w/ JT RE filing of exhibits. File and serve [actual time 1.5 hour].	0.5	325.00	162.50
09/16/2014 Rev notice from Santander that \$1,500 check tendered for deposition expenses was returned NSF. e-mails sent to clnts advising that if not made good within 24 hours i would petition Crt to withdraw my appearance. Update Qbooks IOLTA acct,post smnt charge for bank fee.	0.2	325.00	65.00
09/17/2014 travel to S'field and return for hearing on Barbeaus' mo to dismiss. Mo Allowed, due to Debtors failure to file required business operating reports.	4	325.00	1,300.00
09/17/2014 Download and print Orders dismissing c. 13 case and canceling trial on adversary proceeding. Scan both and forward via e-mail to both Michael and Christine Schold.	0.1	325.00	32.50
09/17/2014 TC from Mike, told him that a motion for reconsideration could be filed, but only if missing reports were complete and ready to be submitted.	0.1	325.00	32.50
09/18/2014 RC to Mike, discussed go forward options. Told him that there were \$200k in claims that wd be discharged in BK, and that if he wanted to seek reconsideration of dismissal, he needed to provide 2013 tax return and reports for 2014, or reports for 2013 and 2014. Told him mo to reconsider had to be filed w/in 7 -10 days. He will call accountant to get update on status.	0.2	325.00	65.00
09/18/2014 TC from Christine. Went over options, incl her ? RE transferring title to ME property. Advised there were \$200k in other debts that cd be discharged. She says that Michael is picking up 1st half of 2013 reports from other acct today, wants PMS to send her again copy of c. 13 Ttee.'s form. Explained she only needed to attach Qbooks report and sign it. Confer w/ JT RE follow up.	0.3	325.00	97.50
09/22/2014 TC to D. Pappalardo, left detailed msg on her VM advising that Debtors wished to file a mo for reconsideration, and asked that she hold file for a couple of days.	0.1	325.00	32.50
09/23/2014 Rev e-mail from Christine, says operating reports will be ready on Wed.	0.1	325.00	32.50
09/26/2014 Rev e-mail from Christine w/attached P & L statements for 2013 and 2014. replied to e-mails [2].	0.3	325.00	97.50
09/26/2014 Research basis to vacate dismissal. Prep mo to vacate, w/ exhibits, file and serve. Copy e-mailed to Christine.	1.5	325.00	487.50
09/29/2014 Download, print and rev Crt Order of Deficiency RE c/s on mo to reconsider. Confer w/ JT.	0.1	325.00	32.50

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**TOTAL**

MATTER Section II matters

DESCRIPTION	HOURS	RATE	AMOUNT
9/30/14 - TC with Paula at Bankruptcy Court re deficiency notice on certificate of service for mo/vacate dismissal. She said the Motion has to be served on all creditors.	0.1	100.00	10.00
9/30/14 - prepare draft supplemental certificate of service on mo/to vacate dismissal.	0.5	100.00	50.00
9/30/14 - prepare Supplemental Certificate of Service in final and file with Court. Make 49 copies of Mo/Vacate Dismissal and mail to all creditors on matrix.	0.5	100.00	50.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$6,055.00

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
05/31/2013 Status review. Per PACER, atty Champagne filed a return of service on the summons on May 1, 2013. On May 3rd she filed an Amended Complaint, no service of summons re Amended Complaint on docket. Is a c/s of mail service on Michael and Christine. First review of docs brought in by Michael. Downloaded and print/save Exhibit 1 to Amended Complaint.	0.8	325.00	260.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$260.00

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
06/12/2013 RC to atty Nadine Champagne, she will e-mail a copy of the amended Complaint to PMS. Told her I would file a responsive pleading in a week. Saved .pdf files attached to her e-mail, added to Task list.	0.3	325.00	97.50
06/13/2013 Begin legal research RE response to Amended Complaint.	1	325.00	325.00
06/14/2013 Rev docs from client, Exhibits to Complaint. Prepare Excel spreadsheet of project accounting. Michael is owed \$25,399.84. e-mail sent to Christine w/ file attached asking that she review it.	1	325.00	325.00
06/17/2013 Follow up e-mail sent to Christine RE accounting summary of Barbeau claim.	0.1	325.00	32.50
06/18/2013 1st review of response to e-mail from Christine.	0.1	325.00	32.50
06/18/2013 Rev e-mail from Christine, Rev'd file and extracted hand written doc. Scanned and e-mailed it to her asking for confirmation and clarification of notes. Discussed computation of allowances as credits.	0.5	325.00	162.50
06/20/2013 Legal research, requested copy of case and 2005 article from Boston Bar Assoc Journal from Worc. Law Library. Rec'd, printed, saved, and rev'd Duclersaint v. Federal National Mortgage Association.	0.3	325.00	97.50
06/24/2013 Unscheduled office visit by Michael. Dropped off photos of site work, and completed house. Also, occupancy certificate, scanned it into digital file, and placed photos and paper copy in file.	0.3	325.00	97.50
06/28/2013 TC from atty Nadine Champagne. Says that their intention is to file an amended Complaint. Told her I would not assent to a motion to amend until I saw the amended pleading, but that if she needed additional time, and since I wd be away next week, that I would assent to 10-14 day extension to respond. She asked about Ttee.'s objection to ME property, told her that I wd be filing a mo to extend deadline to file amended Plan because Barbeau's claim was not yet resolved.	0.2	325.00	65.00
06/28/2013 Download and print Notice of Hearing RE motion to strike. Confer w/. JT RE prep of notice and service.	0.1	325.00	32.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$1,267.50

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
7/2/13 - prepare draft Notice of Hearing on Motion to Strike Amended Complaint.	0.5	100.00	50.00
07/08/2013 Rev's mo filed by atty Champagne seeking leave to file amended complaint. Pleading attached is a Word redlined doc. Per TC w/ Nadine, no opposition to mo is to be filed, let Crt. handle.	0.1	325.00	32.50
7/8/13 - Prepare final Notice of Hearing on Motion to Strike Amended Complaint, file with Court and mail to interested parties.	0.4	100.00	40.00
07/22/2013 Download and print Crt Order allowing mo to amend complaint.	0.1	325.00	32.50
07/29/2013 e-mail sent to atty Champagne asking about status of 2nd amended complaint. Rev reply and print attached 2nd amended Complaint.	0.4	325.00	130.00
07/30/2013 Prepare answer and counterclaim [w/ Exhibits] to Second Amended Complaint, file via ECF, serve as per c/s. Copy e-mailed to clnts. Response deadline added to Task list.	2	325.00	650.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$935.00



MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
08/20/2013 Rev and reply to e-mail fro Christine RE Barbeau adversary.	0.1	325.00	32.50

For informational purposes only; payments are to be  
made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$32.50

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
09/05/2013 Rev docket, no answer to counterclaim has been filed. Download and print pre-trial order, confer w/ JT RE scheduling deadlines. Prepare R. 55(a), file by ECF, mail to Melissa Levine-Piro, Esq. and clnt.	0.7	325.00	227.50
09/06/2013 Download and print Notice of Deficiency, TC to Paula at Bankr Crt.. says that Chambers wants the Plaintiffs served directly. PMS to file Supp Certif of Service w/ link to Adv Doc #19; confer w/ JT.	0.1	325.00	32.50
9/6/13 - prepare Supplemental Certificate of Service. Mail copies of Request for Entry of Default to Arthur Barbeau and Elizabeth Barbeau, File Supplemental Certificate of Service with Court.	0.5	100.00	50.00
09/18/2013 Download, print and review atty Champagne's opposition to entry of default, and proposed Answer to Counterclaim and Counterclaims to Counterclaims.	0.2	325.00	65.00
09/27/2013 Download, print and review Notice of Hearing RE Req for Entry of Default.	0.1	325.00	32.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$407.50

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
10/1/13 - Prepare Notice of Hearing on Request for Entry of Default, mail to interested parties and file with Court	0.5	100.00	50.00
10/01/2013 Rev and reply to e-mail from atty Champagne RE scheduling conf call.	0.1	325.00	32.50
10/02/2013 Rev e-mail from atty Champagne, update calendar for conference call today.	0.1	325.00	32.50
10/02/2013 Prep for Tel call from atty Champagne, review Crt. Pre-Trial Order.	0.2	325.00	65.00
10/02/2013 Conf call w/ attys Champagne and Levine-Piro. Told them it was my intention to file a motion for j'ment on the pleadings or in the alternative s.j .w/in 14 days. Told Levine-Piro that I would convey all settlement proposals to Michael, and explained the steps that would be needed to obtain Ctr. approval, including Plan confirmation.	0.3	325.00	97.50
10/02/2013 Rev Registry of Deeds records. Print some as needed. There is no record of any deed in to or out by Schold Builders. Notice of Mechanics Lien filed before recorded attachments properly refers to Michael Schold DBA Schold Builders.	0.3	325.00	97.50
10/03/2013 Draft and edit e-mail to atty Champagne w/ attached .pdf file of Worc. Registry of Deeds screen shot showing no property owned by Schold Builders, suggested that atty Melissa Levine-Piro was negligent; bcc: Christine Schold.	0.1	325.00	32.50
10/08/2013 Follow up e-mail sent to atty Champagne RE Reg of Deeds search on Schold Builders.	0.1	325.00	32.50
10/08/2013 TC from atty Champagne, says that their position as to validity of lien is unchanged, "will have to be decided by the judge". She says there is a question of "standing". Told her I would start working on a dispositive motion tomorrow.	2.75	325.00	893.75
10/10/2013 Begin prep of mo for partial summary j'ment/j'ment on the pleadings.	5.2	325.00	1,690.00
10/11/2013 Complete brief RE mo for partial summ j'ment/j'ment on pleadings. File mo and memo via ECF. Hard copies mailed to atty Piro-Levine, Barbeaus and M. Schold.	0.3	325.00	97.50
10/17/2013 Download, print and review Crt Order RE mo for partial s.j. Set for hearing 11/12/13 at 3 PM in Worcester. next week's matters are continued to same time. Update Calendar, scanned Order and e-mailed it to Chris.	0.1	325.00	32.50
10/18/2013 Rev and reply to e-mail from Chris.	0.2	325.00	65.00
10/30/2013 Download, print and save Defs Opp to Mo for Partial Summary J'ment. Copies e-mail to Christine	0.5	325.00	162.50
10/30/2013 Review memo in opposition to mo for partial s.j. Argument about 6 Bill Graham is mathematically ridiculous;l there is no equity on which to base a secured claim. Rev 109(e) and cited case law for definition of a "liquidated" debt. This is clearly not a "liquidated" debt - we are \$300,000 apart.			

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$3,478.75

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
11/08/2013 Rev file for hearing on Tues. Confirmed time.	0.1	325.00	32.50
11/12/2013 Prep for and attend Crt hearing on mo for partial s.j. Allowed in part [claim, if any is unsecured], denied as to dischargeability aspects. Discovery schedule set, trial date set. Confer w/ Plntffs" attys afterwards.	1.5	325.00	487.50
11/12/2013 Download, print and review Crt Orders on motions.	0.1	325.00	32.50
11/13/2013 Download, print and save 2nd Pre Trial Order. Rev sec. 109 as to current unsecured debt limits. Confer w/ JT RE updated Task list deadlines. e-mail w/ report sent to clnts.	0.4	325.00	130.00
11/15/2013 Update Task list as to follow up w/ Plntfs' atty. Draft and edit e-mail to Joanne Psilos RE advancing deadline to file an amended Plan to track adversary proceeding.	0.2	325.00	65.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$747.50

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
12/02/2013 Draft and edit e-mail to atty Champagne, bcc: Christine.	0.2	325.00	65.00
12/02/2013 Review and reply to e-mail from atty Champagne.	0.2	325.00	65.00
12/02/2013 Rev and reply to e-mail from atty Champagne.	0.1	325.00	32.50
12/03/2013 Rev e-mail from atty Piro Levine w/ ints/doc req in .pdf format. Replied asking that she send in Word. Rev'd discovery requests and forwarded them to Christine w/req that she and Michael begin preparing response immediately, because holidays would interrupt time to answer.	0.3	325.00	97.50
12/05/2013 TC w/ Christine, went over prep of responses to discovery, told her to focus on ints, not doc requests. Discussed possible settlement scenarios, she will speak to Michael.	0.2	325.00	65.00
12/30/2013 rev e-mail from Christine w/ draft answers in Excel format to ints.	0.3	325.00	97.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$422.50

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
work on draft answers to interrogatories using information sent by Christine Schold.	1	100.00	100.00
01/14/2014 Rev and reply to e-mail from atty Piro Levine RE status of Def's responses to ints.	0.1	325.00	32.50
01/15/2014 Rev JT's entry of data into 1st draft of responses to ints, continue prep of responses, forward to clients for review and additional responses.	1.5	325.00	487.50
01/21/2014 rev e-mails from Christine, revise draft answers to ints. and return to her for their final review and signature.	0.8	325.00	260.00
01/24/2014 Final edits to answers to ints, prep c/s, sent ans via e-mail to atty Piro Levine, w/ cc: attys Champagne, Pappalardo and R. King. Hard copy mailed to atty Piro Levine, c/s filed by ECF	0.5	325.00	162.50
01/27/2014 Prep Def's 1st Ints to Plaintiffs, pleadings e-mailed to: nadine@nadinechampagnelaw.com and Melissa Levine-Piro, Esq.: levinepirolaw@gmail.com	1.5	325.00	487.50
01/28/2014 Begin prep of requests for admission.	1.9	325.00	617.50
01/28/2014 Compile docs to be attached to Req for Admissions, confer RE scanning of photos.	0.3	325.00	97.50
01/29/2014 Download scanned photos, complete Req for Admissions, prepared c/s, concerted and assembled exhibits to Req, filed c/s only via ECF, served Req via e-mail to attys Champagne and Piro-Levine w/ read receipt requested.	1	325.00	325.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$2,570.00

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
02/03/2014 Rev and reply to e-mail from atty Champagne, advised I would respond to document request this week.	0.1	325.00	32.50
02/04/2014 TC from D. Pappalardo, says that Barbeaus hired a private investigator who has provided her w/ documents showing that Michael has vehicles that were not scheduled. She will send copies.	0.1	325.00	32.50
02/14/2014 Rev and reply to e-mail from atty Champagne requesting additional time to respond to discovery requests	0.1	325.00	32.50
02/18/2014 Begin prep of response to doc request	0.1	325.00	32.50
02/20/2014 Continue prep of response to doc request. Serve via e-mail, c/s only filed by ECF.	1	325.00	325.00
2/20/14 - make copies of documents to send in response to Request No. 8 of Production of Documents. Prepare and send letter to Nadine Champagne with copies.	0.5	100.00	50.00
02/20/2014 Rev and OK Its draft of cover letter to atty Champagne, discussed redactions of docs w/ JT.	0.1	325.00	32.50
02/26/2014 rev e-mail from atty Champagne requesting a conference to schedule a deposition of Michael Schold.	0.1	325.00	32.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$570.00

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
03/12/2014 Draft mo for j'ment on the pleadings based upon Plntffs' 's failure to answer Req for Admissions, memo in support. Compile exhibit, prep c/s. File via ECF, hard copy mail to atty Piro Levine, copies e-mailed to clnt. Reply to e-mail from atty Champagne. Rev'd her response and replied.	2.2	325.00	715.00
03/12/2014 Download, print and review Crt. Notice of Deficiency. TC to Paula, says that Plntffs must also be served [even though they are represented by two attys]. Draft Supp c/s, file w/ Crt. Copies of pleadings mailed to Barbeaus.	0.4	325.00	130.00
03/12/2014 download, print and 1st review of Plntf's emer mo to extend discovery schedule.	0.1	325.00	32.50
03/13/2014 Download, print and review Crt Order setting hearing for tomorrow at 10 AM in Springfield on both parties' motions. Added to Calendar. Confer w/ JT RE prep of Notice and c/s. Instructed her to serve atty Piro-Levine by e-mail, and mail to the Barbeaus. Rev'd and printed e-mails [2] RE extensions of time to respond.	0.4	325.00	130.00
3/13/14 - prepare notice of hearing on Motion of Michael Schold for Judgment on the Pleadings, file with Court, prepare and send e-mail with copy of Notice of Hearing to Melissa Levine-Piro, prepare and send fax with copy of Notice of Hearing to Melissa Levine-Piro and mail copy of Notice of Hearing to Arthur and Elizabeth Barbeau.	1	100.00	100.00
03/13/2014 Confer w/ JT, rev'd 1st draft of notice and c/s, e-mail and fax cvr sheet to atty Piro Levine. There is an e-mail issue.	0.1	325.00	32.50
03/13/2014 draft file and serve response to Plntff's emergency mo to extend discovery deadline. Copy e-mail to atty Piro-Levine.	1	325.00	325.00
03/13/2014 Download, print and review Docket as to Case No. 13-04026. Prep for tomorrow's hearing. Download, print and review addit last minute ECF filings by atty Champagne.	1	325.00	325.00
03/13/2014 Travel to S'field and return for emergency hearing on Plntffs' mo to compel discovery, extend discovery deadlines, Def's mo for j'ment on the pleadings.	3.5	325.00	1,137.50
03/14/2014 Download and print J. Boroff's Order Re this AM's hearing.	0.2	325.00	65.00
03/17/2014 Review list of mediators maintained by Bank Ctr., many are retired state court judges. Somma and Tom Raftery are on list. Draft and edit e-mail to atty Aframe asking for his suggestions as to who else would be familiar w/ BK law and discharge issues. Print and review local rules as to mediation.	0.4	325.00	130.00
03/21/2014 TC w/ atty Aframe RE possible mediators.	0.1	325.00	32.50
03/21/2014 Rev reply to e-mail from atty Champagne.	0.1	325.00	32.50
03/21/2014 Rev file, compile summary of discovery related events. Draft and edit detailed e-mail to attorney Champagne, w/ attached summary	1.3	325.00	422.50
03/25/2014 Rev e-mails from Nadine. Rev Crt Order, draft and edit response.	0.9	325.00	292.50
03/25/2014 e-mail sent to Christine Schold RE pending discovery issues.	0.1	325.00	32.50
03/26/2014 1st rev of e-mail from atty Champagne, says that they agree w/ PMS's analysis of J. Boroff's Order, want PMS to draft docs.	0.1	325.00	32.50
03/27/2014 Draft joint statement to be filed w/ Crt., and Memorandum regarding discovery issues. Both docs e-mailed to attys Champagne and Piro-Levine for their review and comment.	0.8	325.00	260.00
03/27/2014 Rev and reply to e-mail from atty Champagne RE discovery issues, bcc: Christine	0.2	325.00	65.00
03/28/2014 TC from Christine. Discussed status of discovery, production of docs, possible outcomes, and their desire to settle and for closure.	0.3	325.00	97.50
03/28/2014 Rev and reply to e-mail from atty Champagne.	0.3	325.00	97.50
03/28/2014 Revise Agreement and e-mail to atty Champagne for her OK.	0.3	325.00	97.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL**



MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
03/28/2014 Rev and reply to e-mail from atty Champagne w/ instruction as to filing after 2.30 PM	0.1	325.00	32.50
03/28/2014 Final edits to Jt Statement, convert and attach .pdf file. File w/ Bankr Crt. e-mailed docketed copy to Christine.	0.3	325.00	97.50

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$4,715.00

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
04/04/2014 Download, print and review Crt Order RE discovery dispute. 4/10 hearing is canceled, update Calendar.	0.1	325.00	32.50
04/07/2014 Status review. e-mail sent to Christine Schold asking about status of her efforts to gather docs.	0.1	325.00	32.50
04/08/2014 Review and reply to e-mail from Christine,, docs will be dropped off this afternoon, confer w/ JT.	0.1	325.00	32.50
4/8/14 - Christine Schold came to the office with copies of bank statements except for trucking account statements for 2013 (they are with accountant). Michael will be in tomorrow with more documents re proof of payment and taxes. Christine will call PMS tomorrow around 2pm to discuss taxes.	0.1	100.00	10.00
04/09/2014 draft and edit e-mail to atty Champagne RE Plntffs failure to comply w/ agreed deadline to answer ints, req for admissions. 1st rev of response from atty Piro Levine.	0.2	325.00	65.00
04/10/2014 1st review of e-mails from atty Piro Levine w/ Plntffs' answers to ints and req for Admission, 2nd e-mail w/ attached docs. Forwarded all to Christine.	0.5	325.00	162.50
4/10/14 - make copies of all bank statements dropped off by client. clip by account and year.	2	100.00	200.00
4/11/14 - make copies of additional documents - tax returns and invoices.	1.5	100.00	150.00
04/11/2014 Confer [2x] w/ JT RE status of docs Mike was to have dropped off, and copying. Directed her to Doc Req for categorizing docs.	0.2	325.00	65.00
4/11/14 - prepare and send letter to Melissa Levine-Piro, Esq with copies of documents re request for production of documents.	0.4	100.00	40.00
04/17/2014 rev and reply to e-mail from atty Champagne.	0.4	325.00	130.00
04/17/2014 Rev and reply to e-mail from atty Piro Levine.	0.2	325.00	65.00
04/29/2014 e-mail sent to Chris RE mtg, replied to e-mail from atty Champagne.	0.2	325.00	65.00
04/30/2014 TC from Christine. They will review the claims for additional payments made by homeowners and she will put them in a spreadsheet. Says that Michael's prior atty would testify that she offered to atty Piro Levine to have Michael come out to resolve the punchlist items. She will call on Monday	0.2	325.00	65.00
04/30/2014 Rev e-mail from attorney Champagne. Draft, and edit, reply w/ bcc: to Christine Schold.	0.4	325.00	130.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$1,245.00

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
05/01/2014 Download, save and review Pltffs' mo to take R. 2004 examination of Christine w/ attached Exhibits, including building permit for construction of daughter Brittany's home. [NB: Michael's name does not appear on building permit, and per e-mail from Christine, the house was built by the developer of that subdivision and Michael had nothing to do with it.	0.4	325.00	130.00
05/02/2014 RC to Christine RE response to motion to take a R. 2004 exam of her. Decided that affs responsive to reach of the three doc requests. Brittany will do aff as to purchase of house, Mike will do aff stating that he had nothing to do with house, Christine will do aff as to amnt given to Brittany for wedding expenses and school, and also docs as to business. e-mail sent to Christine	0.4	325.00	130.00
05/02/2014 Download, save and review mo to take R 2004 exam of Millbury Savings Bank. Copy forwarded to Christine.	0.2	325.00	65.00
05/02/2014 Download, print and review Crt Orders denying motions to take R. 2004 exams. Rev'd Order scheduling pre-trial conf. in Worc. Added to calendar. e-mail sent to Christine	0.2	325.00	65.00
05/05/2014 RC to atty Champagne @ 1 PM, LM w/ best times to call back.	0.1	325.00	32.50
05/06/2014 RC to atty Champagne @ 11.54 AM. Busy, no way to leave msg. 2nd attempt, LM w/ best times to c.b.	0.1	325.00	32.50
05/06/2014 RC from atty Champagne. Says she will be re-filing motions to examine in a procedurally correct way. Told her that I was expecting a spreadsheet from Christine with info on the additional claims for credits. Told her that settlement was still a possibility, and discussed PMS' concerns about having 2 attys representing Plaintiffs.	0.2	325.00	65.00
05/07/2014 Status review. e-mail sent to Christine asking about spreadsheet that PMS was to have received yesterday.	0.1	325.00	32.50
05/16/2014 TC from Christine, says that she was served w/ subpoena to be deposed. Told her I wd review most recent e-mails from atty Champagne and call her on Monday.	0.1	325.00	32.50
05/16/2014 rev e-mail w/ attachments from atty Champagne RE depo of Christine and request for production of documents (see Exh A).	0.5	325.00	162.50
05/19/2014 Rev docket, and J. Boroff's Order dtd 3/14/14. Replied to e-mail from atty Champagne.	0.2	325.00	65.00
05/19/2014 Rev and reply to e-mail from atty Champagne RE date of taking Christine's deposition. Advised that date was on the subpoena that she signed.	0.1	325.00	32.50
05/19/2014 Rev e-mails [2] from atty Champagne.	0.1	325.00	32.50
05/21/2014 e-mail exchange w/ atty Champagne re conducting depo at PMS's office next Tues. e-mail exchange w/ Barry, obtained OK for use of conf room. e-mail sent to atty Champagne. Rev e-mails from Christine Schold w/ attached docs, including affidavits, police report and print all. Rev req for docs attached to subpoena to Christine, and com[pare to previously produced documents. e-mail to Christine RE spreadsheet of docs produced by Plntff. TC to Michael, and Christine. Advised that exam was going forward on Tuesday, agreed that she wd be in at 9.15 to confer w/ Phil before hand. She will send e-mail w/ QuickBooks report that has not been previously provided to PMS. Discussed need to provide monthly reports to c. 13 Ttee. She says they are meeting w/ a new accountant, appt was scheduled for this coming Tuesday. She will call him to reschedule.	1.5	325.00	487.50
05/22/2014 Rev and reply to e-mail from atty Champagne, cc: Piro Levine, bcc: Christine Schold.	0.1	325.00	32.50
05/23/2014 Rev msg, e-mail from atty Champagne. Location of deposition has been moved to Aaron Hutchin's office. Replied to her e-mail, e-mail sent to Christine Schold advising of change of location.	0.4	325.00	130.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL**

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
05/23/2014 Prep response to Subpoena to Produce Documents RE Christine Schold. Scan and attach docs. Converted all to .pdf format and sent by e-mail to attys Champagne and Piro Levine.	0.75	325.00	243.75
05/23/2014 Travel to Northborough, confer w/ Christine in prep for her exam. Attend R 2004 examination. Conferred w/ Christine RE go-forward issues, returned to Worcester.	4.8	325.00	1,560.00
05/29/2014 Rev e-mail from Nadine Champagne. Has lengthy attachment RE mold/dampness issues w/ one property. Replied to her e-mail asking for best times to call her. Rev her response and reply.	0.3	325.00	97.50
05/30/2014 2nd review of e-mail attachments from atty Champagne. Housing Crt case was filed in May 2013, BK case was filed in Jan. Is post-pet. RC to atty Champagne, discussed relevance of Code issue in rental property to Barbeaus objection to discharge. says she wants to put it before J. Boroff on the 17th, and that she believes that hearing will be moved to S'field. Asked that she not deem her pleadings emergency or expedited, so that PMS would have time to file proper response. PMS to send her Christine's Schold's summary of addit docs produced by atty Piro Levine.	0.4	325.00	130.00

For informational purposes only; payments are to be made only with approval of the U.S. Bankruptcy Court.

**TOTAL** \$3,558.75

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
06/05/2014 TC from Denise Pappalardo regarding her 40 minute conversation w/ atty Nadine Champagne. Discussed status of adversary case, possible ways to structure settlement. Denise says that other attys have structured settlements so that some \$ can be paid through Plan and some \$ outside Plan.	0.4	325.00	130.00
06/05/2014 Rev e-mail from atty Champagne RE taking of Mike's deposition on 6/24. Replied that I had Crt hearings and 341 mtgs scheduled that day, and that I was available on 6/62/14.	0.1	325.00	32.50
06/06/2014 rev and reply to e-mail fro atty Champagne RE possible dates to take Michael's deposition in July.	0.1	325.00	32.50
6/12/14 - Obtain docket report on pacer to confirm date/location of pre-trial. Hearing is scheduled for 6/17/14 at 11:30 in Worcester.	0.1	100.00	10.00
6/12/14 - TC with Paula at Bankruptcy Court re confirm date/time of pre-trial. She explained that the pre-trial scheduled for 6/17/14 at 11:30 will be moved to Springfield due to construction in the Worcester Courtroom. She said we will be receiving a notice from the Court.	0.1	100.00	10.00
06/16/2014 Prep for tomorrow's status conference hearing	0.3	325.00	97.50
06/17/2014 Final prep for today's status conference.	0.2	325.00	65.00
06/17/2014 Travel to S'field and return for status/pre-trial conf. Advised J. Boroff that we were still in discovery phase. Crt set discovery deadline at 9/19/14, trial date set for Nov. 13 and 14. Confer w/ attys Piro Levine and Champagne RE interest in settlement, they want PMS to communicate w/ atty Levine. Update Calendar	3.3	325.00	1,072.50
06/18/2014 rev docs produced by Millbury Savings Bank in response to Plntffs' subpoena. THESE ARE HELPFUL TO US.	0.2	325.00	65.00
06/19/2014 e-mail sent to Christine asking that she call Friday to discuss possible steps toward settlement.	0.1	325.00	32.50
06/20/2014 TC from Christine. Discussed status conference, and Plntffs' interest in settlement. She will update Excel spreadsheet that PMS has prepared with additional info from docs provided by atty Piro Levine, and we will meet next week to go over it. She also says she is not renting an apartment at this time, now. e-mail sent to her w/ attached Excel file. e-mail sent w/ cc: atty Champagne to Piro Levine RE above accounting.	0.4	325.00	130.00
06/23/2014 1st review of e-mail w/ attached spreadsheet from Christine addressing issues of allowances. e-mail sent in reply.	0.3	325.00	97.50
06/23/2014 rev e-mail from atty Piro Levine, and reply advising I had mtg w/ Christine Schold sched for 5 PM tom. Asked if she wd be available by phone. e-mail exchange RE availability and face to face meeting.	0.4	325.00	130.00
06/23/2014 rev e-mail from Christine, she can leave at 4 PM. e-mail sent to atty Levine	0.1	325.00	32.50
06/24/2014 Scan Christine's spreadsheet, forward via e-mail to Melissa, asked when she would be available for Tel conf.	0.2	325.00	65.00
06/24/2014 Prepare for meeting w/ Christine. Confer w/ her, rev'd accounting. See notes. PMS to draft e-mail to atty Piro Levine for Christine to review tomorrow before sending it to atty Levine.	1.3	325.00	422.50
06/25/2014 Draft response to settlement demand to atty Piro Levine. Forward via e-mail to Christine Schold to review. e-mail sent to Melissa advising that she should receive letter tomorrow.	1.3	325.00	422.50
06/26/2014 TC w/ Christine RE calculations and final edits. Complete letter to atty Levine Piro, mailed and e-mailed it to her, atty Champagne and C. Schold.	0.6	325.00	195.00
06/27/2014 rev e-mail from atty Levine Piro saying that settlement offer was rejected and that Plntffs' want to go to trial. Forward to Christine.	0.1	325.00	32.50

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**TOTAL** \$3,075.00

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
07/07/2014 rev e-mails from attys Levine Piro and Champagne RE taking of Michael's deposition. Begin review of e-mail history, it is not on the Calendar for July 10th.	0.2	325.00	65.00
07/07/2014 rev e-mails from attys Champagne and Levine-Piro RE taking of Michael's deposition. Rev'd e-mail history and replied, w/ bcc: Christine.	0.5	325.00	162.50
07/08/2014 Confer w/ Steve Reynolds RE going forward to trial and need for new pre-trial deadlines.	0.1	325.00	32.50
07/10/2014 Rev e-mail from atty Levine-Piro. Draft and edit response, cc: atty Champagne, bcc: Christine. Added depo date of 7/25 to Calendar.	0.6	325.00	195.00
7/14/14 - TC with Flynn Reporting re date and time for Christine Schold to review and sign her deposition. They have to arrange a date and time with Law Library to use the conference room. Easier to have Christine contact Flynn to discuss her availability	0.1	100.00	10.00
07/14/2014 Rev JT's 1st draft of e-mail to Christine RE review and signing of transcript.	0.1	325.00	32.50
7/14/14 - prepare and send e-mail to Christine with contact info for Flynn Reporting to schedule date and time to sign deposition. Gave her dates PMS available to go with her. Also requested status of Chapter 13 Monthly Reports and completed and signed W-9 Forms for Seterus.	0.2	100.00	20.00
07/14/2014 RC to Mike, LM at 2.25 PM w/ best times to c.b. RC from him, he is available 7/25/14 to be deposed. Set up appt for day before to prepare. Draft and edit e-mail to atty Piro Levine, cc: Champagne, bcc Christine confirming his availability, again asked when Barbeaus and their attys would be available in August to be deposed.	0.3	325.00	97.50
07/14/2014 Rev e-mail from Nadine Champagne RE scheduling deposition of the Barbeaus.	0.1	325.00	32.50
07/18/2014 Rev and reply to e-mail from atty Champagne RE depositions.	0.1	325.00	32.50
07/18/2014 TC from Christine RE reading/signing of transcript of her deposition. Flynn now says that she has to go to Framingham. Will require her taking time off from work, which is hard. Discussed settlement options.	0.3	325.00	97.50
07/22/2014 Rev Calendar, rev BR 7030. Prep notices of depositions for Arthur Barbeau and Elizabeth Barbeau. Prep c/s. File via ECF, hard copies mailed directly to Barbeaus. Rev and reply to e-mail from Christine RE available times to review her deposition transcript.	0.8	325.00	260.00
07/22/2014 Rev Crt's Nov pre-trial order, note to JT. Begin prep for depositions for Barbeaus, gather and ID docs, begin outline of ?s. Rev their answers to ints.	1.5	325.00	487.50
07/23/2014 1st rev of e-mail from atty Champagne RE depositions.	0.1	325.00	32.50
07/23/2014 rev e-mail from Christine, says that Flynn Reporting will be mailing her a condensed copy of the transcript to review and sign. e-mail sent to atty Champagne so advising.	0.1	325.00	32.50
07/24/2014 Rev Fed Rules as to requirement for notice of depositions. Mass Rules require 7 days, Fed rules require "reasonable" notice. Rev'd e-mail history RE scheduling of deposition w/ atty Piro Levine, draft and send her e-mail asking to confirm depo of Michael is going forward tomorrow, and when I should expect to receive required Notice.	0.5	325.00	162.50
07/24/2014 Confer w/ clnt, prep for tomorrow's deposition. Rev e-mail from atty Piro Levine, says Mike was served by Constable. Confronted Mike, he said he just assumed PMS was sent a copy. He did not bring a copy. Asked if he was instructed to produce docs. He says he was asked to produce docs regarding another construction project he was involved with. Replied to e-mail from atty Piro Levine. e-mail exchange w/ attys Piro Levine, and Champagne RE depo tomorrow. TC w/ Michael, he will fax docs left by Constable. Rev'd fax from Michael, is incomplete. Instructed JT to call him. Rev's addit fax, e-mail attachment from atty Piro Levine.	1.8	325.00	585.00

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**TOTAL**

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
7/24/14 - TC with Michael. Told him we need copy of everything he was served. He will fax it over.	0.1	100.00	10.00
7/24/14 - TC with Michael. Told him depo is scheduled to start at 10:00 a.m. PMS will meet him in the lobby at 9:45 a.m.	0.1	100.00	10.00
07/25/2014 Confer w/ clnt, attend his deposition, conferred w./ him afterwards. PMS to call atty Piro Levine on Monday at 2 PM	4	325.00	1,300.00
07/25/2014 Begin title rundown on Sholan Circle property. Margin references on two deeds refer to same described property as being both 2 Sholan Circle and 3 Sholan Circle. Property was sold on March 28, 2014 for \$1,150,000 to Corey and Conrad Dufresne of South Boston, MA. Property also straddles Harvard and Boxborough lines, Boxborough is in Middlesex county.	0.5	325.00	162.50
07/28/2014 Research atty Champagne's prior BK experience, it is minimal. 20 cases virtually all c. 7 s. Four c. 13s other than Schold, including one who filed twice. All were dismissed. She brought one adversary proceeding under sec 523(a)(2), and withdrew appearance w/in approx six weeks after successor counsel filed her appearance. See printouts. Prepare chronology of recorded Barbeaus real estate transactions. Create Excel spreadsheet calculating Barbeaus' basis in property and net gain, which came to \$98,504.37, Net return exceeds 9%	1.8	325.00	585.00
07/28/2014 Rev'd ans to ints, obtained Plntffs' current address. Raleigh Durham is closest airport, rev'd flight info/costs. TC to atty Piro Levine. "mailbox is full". drafted e-mail to her, stated willingness to meet with her at her office in Maynard, gave possible dates/times PMS is available for meeting. e-mail sent to client.	0.4	325.00	130.00
07/28/2014 Rev msg, e-mail from atty Piro Levine, says she will away on vacation after today.	0.1	325.00	32.50
07/28/2014 TC @ 4.19 PM to atty Piro Levine. Phone answered by "Jeannie", "will you hold , please?" On hold, then disconnected. 2nd attempt. TC w/ Melissa, says that she was not aware that Barbeaus had sold the house. Discussed taking of their deposition. Began settlement discussions, she will send her worksheet as to allowances. We need to resolve issues around "appliance" and "kitchen" allowances, she says that Barbeaus will agree to waive their claim for attys fees and incidental damages. We are now down to claim for "construction defects of \$29,485". Told her that in the absence of proof of payment, we would not agree based on a walk through by a GC unconnected to the project. Barbeaus need to show proof of actual payment. She will going to the Cape the remainder of this week, but will be available by cell and e-mail. rev e-mail attachment. Forward w/ report to Christine Schold.	0.7	325.00	227.50
07/29/2014 Rev and reply to e-mail from atty Piro Levine, bcc: Christine.	0.2	325.00	65.00
07/29/2014 TC from Christine RE allowance issues [.3] rev e-mail from atty Piro Levine, draft and edit reply.	0.7	325.00	227.50
07/29/2014 Page [2x] through docs previously produced to atty Piro Levine, unable to locate copy of check written to kitchen supplier. e-mail sent to Christine	0.2	325.00	65.00
07/30/2014 rev e-mail from atty Piro Levine RE Naylor Kitchen allowances, forward to Christine.	0.1	325.00	32.50
07/30/2014 rev e-mail from Christine RE kitchen supplier.	0.1	325.00	32.50
07/30/2014 Re-file all docs, set up new files. Download and print mo to quash filed by atty Champagne.	0.7	325.00	227.50

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**TOTAL** \$5,445.00

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
08/01/2014 Draft file and serve expedited mo to extend deadline to file response to mo to quash deposition subpoenas [sic].	0.4	325.00	130.00
08/01/2014 Download and print J. Boroff's Orders RE taking of depositions by video. Confer w/ JT	0.2	325.00	65.00
08/13/2014 Conferred w/ JT and rev'd research RE address of McDermott Enterprises (not provided in Plntffs' Ans to Ints), and on-line research RE sale of 3 Sholan Circle by Barbeaus. Instructed JT to prepare 1st drafts of Subpoenas to Produce Documents directed to McDermott and Dufresnes. Prepared and edited Exhibit A for both to be attached to Subpoenas. Rev'd 1st drafts of Subpoenas, and edited as needed. Confer w/ JT RE drafting of cover letters to Worc Deputy Sheriffs. We will do a separate letter for each. When all docs are in final form, they are to be filed electronically w/ Crt as notice to atty Champagne and e-mail to Piro Levine, and then delivered by hand to Worc Sheriff for service on non-	2	325.00	650.00
parties. Prep c/s for both subpoenas. Filed via ECF w/ Crt, e-mail w/ attached .pdf files sent to atty Piro Levine w/ bcc: Christine			
08/13/2014 Preliminary research RE elements of abuse of process, download and print SJC decision.	0.2	325.00	65.00
08/15/2014 rev and reply to e-mail atty Piro-Levine, bcc: Christine Schold. Declined to withdraw document subpoena served upon Robert McDermott.	0.2	325.00	65.00
08/15/2014 Confer w/ JT re logistics of scheduling video deposition. Draft and send e-mail to attys Piro-Levine and Champagne, bcc: Christine	0.4	325.00	130.00
08/15/2014 Rev and reply to e-mail from atty Piro Levine. Included text of J. Boroff's ordre in e-mail RE allocation of costs.	0.3	325.00	97.50
08/15/2014 Prelim research RE application of work-product doctrine to McDermott [contractor]'s report.	0.5	325.00	162.50
08/18/2014 rev and reply to e-mail from atty Piro Levine RE scheduling of taking video deposition of Barbeaus.	0.1	325.00	32.50
08/18/2014 Rev e-mail from atty Piro Levine RE deposition of expert witness McDermott. Rev'd BR 7026 as to mandatory disclosures RE expert witnesses, and replied to her e-mail.	0.2	325.00	65.00
08/19/2014 Rev Sheriff's return of service of subpoenas upon Corey and Conrad Dufresne, and Robert McDermott - all at last and usual.	0.1	325.00	32.50
08/22/2014 Rev and reply to e-mail from atty Piro Levine RE document subpoena served on McDermott. Rev'd her e-mail w/ two [not three as requested] dates Barbeaus are available to be deposed. rev'd Calendar. Both days are open for PMS. Replied to e-mail advising we wd follow up w/ reporting service, confer w/ JT RE next steps	0.4	325.00	130.00
8/22/14 - TC with Sean at McCarthy to schedule video conference depos of Arthur and Elizabeth Barbeau. Gave Sean date of 9/5/14 starting at 10:00 a.m. He will check availability of location in North Carolina and e-mail options to PMS. He will also check on the time flexibility of place in NC. Sean typically does not schedule another video conference for at least two hours of scheduled end time of previous depo. I reserved two hours for now. If first depo takes less than 1 hour, remaining time can be used on 2nd depot being held right after the first.	0.1	100.00	10.00
08/22/2014 Confer w/ JT RE her conversations with McCarthy RE setting up video depositions of Barbeaus.	0.1	325.00	32.50
08/25/2014 Rev e-mail from Sean at McCarthy Reporting w/ details of 9/5 depo. Forward to atty Piro Levine. Rev and reply to her e-mail RE date. TC w/ Sean RE name of contact person to whom exhibits can be forwarded in advance, rev'd his response.	0.4	325.00	130.00

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**TOTAL**



MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
08/29/2014 TC w/ Christine RE depositions scheduled for Friday. Told her I wd need \$ for costs, she will get funds to PMS before Friday. Decided that Michael should not be present. She wants PMS to again make a settlement offer. Discussed amnt, she and Michael are not in agreement. PMS to send e-mail to Plntffs' attys again offering to discuss settlement.	0.2	325.00	65.00
08/29/2014 rev e-mail from atty Piro Levine asking if depos are going forward in light of the mo to dismiss atty Champagne filed. Replied that depos of Barbeaus wd be taken as scheduled, and that if there was interest in settlement on their part, to call me on Tues.	0.1	325.00	32.50
08/29/2014 1st review of e-mail from Corey Dufresne w/ objection to producing documents responsive to document subpoena. File saved.	0.2	325.00	65.00

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**TOTAL** \$1,960.00

MATTER Adversary Proceeding

DESCRIPTION	HOURS	RATE	AMOUNT
09/02/2014 Rev Corey Dufresne's Obj to Document Subpoena. Rev MLBR R. 7037, draft and edit e-mail to atty Dufresne requesting that they call today. [NB: Per MLBR they have 14 days to respond to request for a conference, which is one day before expiry of discovery deadline.]	0.3	325.00	97.50
09/02/2014 Continue depo prep. Extracted copies of docs to be pre-marked as Exhibits, and parsed same. Organized and marked, confer /w JT RE prep of multiple sets. To be sent via overnight delivery tomorrow to arrive Thursday.	2.3	325.00	747.50
9/3/14 - Make multiple copies of exhibits for depositions.	0.8	100.00	80.00
09/03/2014 Draft cover letter to Business Center manager enclosing exhibits for Friday mornings depositions to be sent by Fed Ex overnight, letter e-mailed to atty Levine-Piro.	0.4	325.00	130.00
09/03/2014 rev and reply to e-mail from Christine, confirmed that depositions are going forward tomorrow. Rev'd e-mail from atty Corey Dufresne RE scheduling tel conf., and replied.	0.2	325.00	65.00
09/04/2014 Prepare outline of deposition questions	1.7	325.00	552.50
09/04/2014 Confirm Fed Ex delivery of depo docs to Cary, NC. Draft and send e-mail to atty Levine-Piro, cc; atty Champagne. TC from Corey Dufresne, went over docs subpoenaed. See notes. His preference is that we obtain docs from Barbeaus, told him I was taking their deposition tomorrow, and would call him in the afternoon after consulting w/ their atty about producing additional docs. Rev e-mail from atty Levine Piro confirming we are going ahead tomorrow as scheduled. Walk in by Michael w/ check for depo expenses, decided he will not attend depo, PMS to call him afterwards.	0.8	325.00	260.00
09/05/2014 Conduct depositions of Elizabeth and Arthur Barbeau.	2.3	325.00	747.50
09/05/2014 TC to Corey Dufresne @ 978.284.2812, left detailed msg RE docs, advising that Arthur Barbeau has all of his personal property in storage trailers. Asked that Corey call back this PM or Monday.	0.1	325.00	32.50
09/08/2014 Rev and organize discovery sub files, confer w/ JT. Corey Dufresne has not returned call.	1.3	325.00	422.50
09/09/2014 TC to McCarthy Reporting. Per Sean, transcript will be ready on Thursday. They will make copy available to PMS then, and will send a letter to deponents' atty advising that transcript can be read and signed at their office. Discussed digital format options. Compute dates. Mo to dismiss was filed 8/27, trans will be ready 9/12. Deadline to file objection is 9/17, same day as scheduled hearing.	0.2	325.00	65.00
09/09/2014 TC from Michael w/ ?s about the depositions taken of the Barbeaus. Gave him update, discussed possible times to meet this week. He will spk to Christine, and c.b. TC from Christine, scheduled appt.	0.2	325.00	65.00
09/10/2014 Confer w. clnts RE status of adversary proceeding, responses to mo to dismiss, Christine will call atty Trudell to request Aff, and get statement RE accounting issues RE monthly reports.	1	325.00	325.00
09/12/2014 rev e-mail from Carol at McCarthy Reporting w/ attached deposition transcripts in multiple file formats. Downloaded and installed e-transcript software. saved all files. Rev'd deposition testimony of both Arthur and Elizabeth.	0.7	325.00	227.50
09/12/2014 RC from Corey Dufresne RE doc subpoena. Agreed he will produce docs responsive to 2, 3, 6 [including any amendments], 7, 8 including e-mails. Will send .pdf file to PMS, and overnight any remaining documents.	0.1	325.00	32.50
09/16/2014 e-mail exchange w/ atty Levine Piro RE depo docs w she was to have provided to PMS. Rev'd e-mail w/ attached docs and saved same. Sent her docs produced by Dufresne.	0.3	325.00	97.50
09/17/2014 Confer w/ JT RE replacement bank check dropped off by Michael.	0.1	325.00	32.50

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**TOTAL** \$3,980.00

3:17 PM

10/29/14

Philip M. Stone, Esq.

## Time by Job Detail

April 30, 1993 through September 30, 2014

Date	Name	Billing Status	Duration	Notes
<b>Schold, Michael dba Schold Builders</b>				
<b>Hourly</b>				
8/24/2012	PMS	Not Billable	0.35	08/24/2012 Initial TC. Owns unincorporated building business. Is in midst of amicable divorce. ...
9/20/2012	PMS	Unbilled	2.00	09/20/2012 Initial meeting with Mike and wife Christine. They have multiple real estate propertie...
9/24/2012	PMS	Unbilled	0.20	09/24/2012 Confer w/ JT RE organization of docs from client. Will be separate sub files for eac...
9/26/2012	PMS	Unbilled	0.30	09/26/2012 TC w/ Joanne Psilos @ c. 13 Ttee.'s office. She is OK w/ using present FMV in de...
10/16/2012	PMS	Unbilled	0.10	10/16/2012 IOC w/ JT, says that Michael called, expects to have balance of docs within a few d...
10/18/2012	PMS	Unbilled	1.50	10/18/2012 Confer w/ Mike and Christine. Daughter is paying student loans that Christine is lia...
11/19/2012	PMS	Unbilled	0.10	11/19/2012 Rev msg left by atty Chris Metzger. RC to him, left detailed msg w. best times to call
11/20/2012	PMS	Unbilled	0.20	11/20/2012 TC from atty Metzger, says that on behalf of Millbury Savings he sent demand lette...
11/27/2012	PMS	Unbilled	0.10	11/27/2012 Rev msg from Michael, RC to him. LM w/ best times to call back.
11/27/2012	PMS	Unbilled	0.20	11/27/2012 TC from Christine. Says that she sat down w/ Michael and keyed in the QuickBook...
12/6/2012	PMS	Unbilled	0.20	12/06/2012 Status review. TC w/ Christine, they have everything together except that Mike is h...
12/18/2012	PMS	Unbilled	0.20	12/18/2012 TC from atty Heather Trudell who is representing Michael in defense of homeown...
12/18/2012	PMS	Unbilled	0.50	12/18/2012 TC from Christine, went over status of foreclosure on single family she is residing in...
1/4/2013	PMS	Unbilled	0.10	01/04/2013 TC from Mike, says that atty defending him in state court litigation sent him a motio...
1/7/2013	PMS	Unbilled	0.50	01/07/2013 Rev additional docs brought in by Mike, including unopened flat from atty Trudell dt...
1/11/2013	PMS	Unbilled	0.50	01/11/2013 Review summary of unsecured, and undersecured debts. Draft and edit e-mails t...
1/14/2013	PMS	Unbilled	0.30	01/14/2013 TC from Mike, wanted to discuss e-mail from PMS declining representation. went o...
1/15/2013	PMS	Unbilled	0.10	01/15/2013 RC to Christine, LM on her cell # that i would be in the office until 5.30 PM, and in t...
1/16/2013	PMS	Unbilled	0.10	01/16/2013 Rev correspondence from Northland RE Citi credit card acct. stating that I am rep...
1/16/2013	PMS	Unbilled	1.00	01/16/2013 TC w/ Christine, e-mail sent to MG, w/ cc: Christine
1/17/2013	PMS	Unbilled	0.10	01/17/2013 TC to Marcia at 9.50 AM, following up on e-mail sent yesterday PM. Asked for c.b.
1/17/2013	PMS	Unbilled	0.30	01/17/2013 TC from Marcia, she will be in today to pick up the file. Says that she e-mailed Christi
1/22/2013	PMS	Unbilled	0.20	01/22/2013 Download and print certificate for Christine only. rev later e-mail RE Michael's certifi
1/23/2013	PMS	Unbilled	0.10	01/23/2013 Confer /w MG, gave her two additional bills faxed from Christine. She will call tomo...
1/24/2013	PMS	Unbilled	0.30	01/24/2013 Confer w/ MG RE scheduling of Bill Graham property that is to be surrendered, fin...
1/25/2013	PMS	Unbilled	0.20	01/25/2013 Rev and sign revised Sugg of Bankr, c/s and cover letter to Superior Crt. Instructed...
1/25/2013	PMS	Unbilled	0.10	01/25/2013 Download and print notice of f341 mtg date, deadlines for filing of claims, added 34...
2/6/2013	PMS	Unbilled	0.20	02/06/2013 TC from MG, needs copy of Order to update. Will need to file mo to extend, says th...
2/6/2013	PMS	Unbilled	0.40	02/06/2013 Prep file and serve emergency motion to extend Deadline to File Schedules, State...
2/7/2013	PMS	Unbilled	0.20	02/07/2013 Download, print and review Order RE motion to extend, copy e-mailed to MG, upd...
2/7/2013	PMS	Unbilled	0.10	02/06/2013 Rev Notice of 341 mtg from Bankr Crt.
2/7/2013	PMS	Unbilled	0.10	02/06/2013 Rev corres from Wells Fargo RE Pebble Beach Rd. property offering workout optio...
2/13/2013	PMS	Unbilled	0.50	02/13/2013 TC w. MG RE post petition tax taking filed by Town of Oxford. Told her it technical ...
2/14/2013	PMS	Unbilled	0.20	02/14/2013 Rev e-mail from MG RE status of insurance certificates and ?s RE scheduling of M...
2/20/2013	PMS	Unbilled	0.10	02/20/2013 Download Notice of Appearance for atty for Hyika Construction Co., Inc., forwarded...
2/21/2013	PMS	Unbilled	0.75	02/21/2013 Rev e-mail from MG w/ attached draft of scheds, summary of rental property expen...
2/21/2013	PMS	Unbilled	2.00	02/21/2013 TC w/ D. Pappalardo, says that Application to be employed does NOT need to be ...
2/22/2013	PMS	Unbilled	0.20	02/22/2013 TC w/ MG, says that Mike is going to Maine, and says he will come back w/ an ac...
2/25/2013	PMS	Unbilled	0.20	02/25/2013 TC w/ MG, she will be in at 12.30. Went over ME valuation issues. Rev'd e-mail fro...
2/25/2013	PMS	Unbilled	2.00	02/25/2013 Review edited schedules, statements and Plan. Confer w/ MG RE edits needed, di...
2/26/2013	PMS	Unbilled	0.20	02/26/2013 Rev e-mail from MG w/ attached revised Excel spreadsheet RE real estate. Confer...
2/26/2013	PMS	Unbilled	0.20	02/26/2013 Download insurance docs filed by MG, there is nothing on the construction equipm...
2/27/2013	PMS	Unbilled	0.30	02/27/2013 Rev e-mail from Christine and print additional coverage page from Liberty. Replie...
2/27/2013	PMS	Unbilled	0.10	02/27/2013 Rev Christine's reply to e-mail RE trailer.
3/1/2013	PMS	Unbilled	2.00	03/01/2013 Prepare for and attend 431 mtg. D. Pappalardo has ?s about calculation of real est...
3/1/2013	PMS	Unbilled	0.10	03/01/2013 Download and print appearance by Polk for BoA RE Bill Graham
3/1/2013	PMS	Unbilled	0.20	03/01/2013 TC from Marcia, says that there is a breakdown of the exemptions analysis in the ...
3/4/2013	PMS	Unbilled	0.10	03/04/2013 rev e-mail from MG RE mortgages and rental and rental property expenses.
3/4/2013	PMS	Unbilled	0.75	03/04/2013 1st review of MG's handwritten notes RE exemptions taken. Does not break out (d...
3/5/2013	PMS	Unbilled	0.40	03/05/2013 Rev e-mail from MG and attached amended 22C. Rev'd amended C, rental figures ...
3/5/2013	PMS	Unbilled	0.10	03/05/2013 Download and print Crt Order RE c. 13 Ttee mo to extend. Confer w/ JT RE prep o...
3/5/2013	PMS	Unbilled	0.00	03/05/2013 Rev Sched C and MG's calculations of exemptions taken [2.15 ->
3/6/2013	PMS	Unbilled	0.70	03/06/2013 Rev deed to 689 Main St. rev Black's to confirm that T by E is JTWR0S. Rev'd file ...
3/6/2013	PMS	Unbilled	0.50	03/06/2013 TC w/ Leo at c. 13 Ttee.'s office RE 22C and Sched C issues. Told him that DSO ...
3/13/2013	PMS	Unbilled	0.20	03/13/2013 RC to Christine and answered her questions regarding the means test. She will ma...
4/23/2013	PMS	Unbilled	0.10	04/23/2013 Download and print 2nd certificates, confer w/ JT.
1/16/2014	PMS	Unbilled	0.10	01/16/2014 Confer w/ JT RE debtor's address issues. Rev'd drafts of petition and filed copy. In...
6/23/2014	PMS	Unbilled	0.10	06/23/2014 e-mail sent to Christine asking that she and Michael review Barbeaus' settlement d...
9/16/2014	PMS	Not Billable	1.00	09/16/2014 Deal w/ computer issues, file conversions, re-organization of files/docs, TC from Cr...
Total Hourly			23.95	
<b>Paralegal</b>				
2/26/2013	Paralegal	Unbilled	0.10	2/26/13 - RC from Leo at Ch 13 Trustee's office stating that the homeowners' insurance info w...
2/26/2013	Paralegal	Unbilled	0.10	2/26/13 - LM on voice mail for Christine asking her to call us about coverage pages for all insur...
2/26/2013	Paralegal	Unbilled	0.25	2/26/13 - TC with Donna (auto ins dept) and Alta (Commercial ins dept) about all insurance poli...
2/26/2013	Paralegal	Unbilled	0.10	2/26/13 - RC from Alta at Thomas J. Woods Insurance Agency. They will be faxing us covera...
2/26/2013	Paralegal	Unbilled	0.10	2/26/13 - LM on voice mail for Christine telling her that we spoke to agents at Thomas Woods I...
2/26/2013	Paralegal	Unbilled	0.10	2/26/13 - RC from Christine Schold. She said the liability coverage on homeowners does carry...
Total Paralegal			0.75	
Total Schold, Michael dba Schold Builders			24.70	

## Time by Job Detail

April 30, 1993 through September 30, 2014

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Date	Name	Billing Status	Duration	Notes
<b>Schold, Michael dba Schold Builders:Section II matters</b>				
<b>Hourly</b>				
2/4/2013	PMS	Billed	0.10	02/04/2013 download and print Notice of Appearance filed by Orlans Moran for Bank of Ameri...
2/7/2013	PMS	Billed	0.10	02/07/2013 Rev corres from Wells Fargo RE go forward mortgage payment on Pebble Beach ...
2/11/2013	PMS	Billed	0.20	02/11/2013 TC from Rick Shells at Bowditch & Dewey, says that Rob Morton contacted him, th...
2/12/2013	PMS	Billed	0.30	02/12/2013 Download, print and review PoC #1 filed by Howe Lumber for \$45,829.11, and Po...
2/12/2013	PMS	Billed	0.20	02/12/2013 rev e-mail from atty Shiels RE Dresser Hill Road property. Rev'd Registry of Deeds...
2/13/2013	PMS	Billed	0.30	02/13/2013 Rev e-mail from atty Shiels w/ payoff information on loan with Millbury Savings. rev'd
2/15/2013	PMS	Billed	0.20	02/14/2013 Download print and review PoC #3 filed by MA DUI. Copy e-mailed to MG.
2/26/2013	PMS	Billed	0.75	02/26/2013 Download and print PoC #4 RE Sallie Mae for \$21,915. Download and print assign...
2/26/2013	PMS	Billed	0.10	02/26/2013 TC from atty Rich Shiels. Told him I had filed a statement of no opposition within p...
3/4/2013	PMS	Billed	0.20	03/04/2013 rev PoC #5 filed by atty Alan Margolies for American Builders for \$8,677.13. We sc...
3/5/2013	PMS	Billed	0.10	03/05/2013 Rev and edit JT's 1st draft of objection to claim #5.
3/5/2013	PMS	Billed	1.00	03/05/2013 Review scheds B and C, create spreadsheet as to (d)(5) exemptions taken. Mike e...
3/6/2013	PMS	Billed	0.10	03/06/2013 RC from Joanne, she will file mo to extend Ttee.'s deadline to object to Plan and cl...
3/11/2013	PMS	Billed	0.10	03/11/2013 Download, print and review PoC #6 filed by BoA on Bill Graham Lane.
3/11/2013	PMS	Billed	0.10	03/11/2013 Rev corres from Wells Fargo re go-forward post petition mortgage payments on 10...
3/12/2013	PMS	Billed	0.10	03/12/2013 Download notice of hearing RE objection to claim of American Builders & Contract...
3/13/2013	PMS	Billed	0.30	03/13/2013 Download and print PoC #7 filed 3/12/13 by atty Alan Margolies on behalf of Ameri...
3/14/2013	PMS	Billed	0.10	03/14/2013 TC from Alisha at BoA, wants to discuss authorization to speak directly w/ Debtors ...
3/15/2013	PMS	Billed	0.10	03/15/2013 Download and print Order granting mo of Millbury Savings Bank for relief from stay.
3/22/2013	PMS	Billed	0.30	03/22/2013 Rev PoC #9 filed by Wells Fargo RE 10 Pebble Beach. Asserts pre-pet arrears of ...
3/22/2013	PMS	Billed	0.50	03/22/2013 Download, print and review motion for relief filed by atty for Barbeaus seeking leav...
3/23/2013	PMS	Billed	0.30	03/23/2013 Rev letter from atty Margolies RE American Builders claim. Rev PoC #5. Problem i...
3/25/2013	PMS	Billed	0.20	03/25/2013 TC to atty Alan Margolies RE two PoCs he filed on behalf of American Builders. To...
3/25/2013	PMS	Billed	0.10	03/25/2013 Rev e-mail from Christine RE issues in paying CitiMortgage and armts due to Well...
3/25/2013	PMS	Billed	0.20	03/25/2013 Rev e-mail from atty Margolies with attached draft of mo to withdraw PoC#5. Edite...
3/26/2013	PMS	Billed	0.10	03/26/2013 Rev and reply to e-mail from atty Margolies RE process for filing Notice of Withdra...
3/26/2013	PMS	Billed	0.20	03/26/2013 RC to atty Margolies, says he cannot file withdrawal of #5 through ECF. Walked hi...
3/26/2013	PMS	Billed	0.10	03/26/2013 Rev JT's 1st draft of objection to PoC #9 filed by Wells Fargo. Is OK to file.
3/27/2013	PMS	Billed	0.30	03/27/2013 Rev Crt Order on withdrawal of PoC #5, hearing has been canceled, updated Cale...
3/28/2013	PMS	Billed	0.30	03/28/2013 Download, print and review PoC #11 filed by National Grid. No accounting is attac...
3/29/2013	PMS	Billed	2.75	03/29/2013 Draft response to Barbeau mo for relief from stay, file and serve. e-mailed Dockete...
3/29/2013	PMS	Not Billable	0.40	03/29/2013 Review docketed copy of Opposition, contains typos as to Code sections. Prepare ...
3/29/2013	PMS	Billed	0.20	03/29/2013 Download, print and review Affidavit of Melissa a. Levine-Piro, Esq.
4/2/2013	PMS	Billed	0.70	04/02/2013 Crt appearance for hearing on Barbeau's motion for relief from stay. After argue...
4/2/2013	PMS	Billed	0.30	04/02/2013 Review e-mail of thanks from Christine. Replied with detailed explanation of what p...
4/3/2013	PMS	Billed	0.10	04/03/2013 Download, print and review Notice of Appearance filed by atty David Silverman on ...
4/4/2013	PMS	Billed	0.20	04/04/2013 Download, print and review two PoCs filed by atty David Silverman. #12 has is for ...
4/10/2013	PMS	Billed	0.30	04/10/2013 Download, print, and review motion of atty Melissa A. Levine Piro to appear pro ha...
4/10/2013	PMS	Billed	0.10	04/10/2013 Download print and review PoC #14 filed by Town of Oxford RE unpaid real estate ...
4/17/2013	PMS	Billed	0.30	04/17/2013 Download, print and save Order allowing mo of atty Levine to appear Pro Hac Vice...
4/17/2013	PMS	Billed	0.20	04/17/2013 Download, print and review PoC #15 filed by PRA as assignee of Capital One Ban...
4/24/2013	PMS	Billed	0.30	04/24/2013 TC from Christine, discussed her concern RE Barbeaus, explained steps of them fi...
4/25/2013	PMS	Billed	0.30	04/25/2013 Download, print and review \ #16, filed by Nadine Champagne for Barbeaus.
4/26/2013	PMS	Billed	0.30	04/26/2013 Download, print, save and review adversary complaint. forwarded it and PoC to Ch...
4/26/2013	PMS	Billed	0.10	04/26/2013 Rev and reply to e-mail from Christine RE mtg next week late PM.
4/29/2013	PMS	Billed	1.00	04/29/2013 Confer w/ clnts RE PoC and adversary complaint filed by Barbeaus. It will take abo...
5/1/2013	PMS	Billed	0.20	05/01/2013 Confer w/ MG RE attachment, she will speak to Marshall Gould RE title standards. ...
5/2/2013	PMS	Billed	0.10	05-41266 Download and print PoC #17 filed by B & L for Amer Exp.
5/6/2013	PMS	Billed	0.30	05/06/2013 Download, print and save amended complaint filed by atty Champagne, copy e-mai...
5/6/2013	PMS	Billed	0.10	05/06/2013 Download, print and review PoC #18 filed by PRA as assignee of GE Capital Retai...
5/6/2013	PMS	Billed	0.20	05/06/2013 rev and reply to MG's e-mail RE applicable title standards to attachment against Sc...
5/20/2013	PMS	Billed	0.50	05/20/2013 RC to atty Joseph Dolben RE tomorrow's scheduled hearing on debtors' objection t...
5/20/2013	PMS	Billed	0.10	05/20/2013 Rev Crt Order. Hearing on Obj to Wells Fargo PoC is continued to 07/09/13 at 10:...
5/21/2013	PMS	Billed	0.20	05/21/2013 Download, print and review PoCs #19 American Express and #20 Lawn Barber, In...
5/28/2013	PMS	Billed	0.20	05/28/2013 Download, print and review Notice of Appearance filed by Timothy Larson/Orlans ...
5/28/2013	PMS	Billed	0.10	05/28/2013 Rev Notice of Mortgage4e payment change filed by BoA dtd 4/5/13. Does not refere...
5/30/2013	PMS	Billed	0.30	05/30/2013 Download, print and rev PoC #21 filed by Nationstar Mortgage LLC as assignee of ...
5/31/2013	PMS	Billed	0.20	05/31/2013 Download and print notice of transfer of PoC #2 from BoA to Green Tree. This is o...
5/31/2013	PMS	Billed	0.30	05/31/2013 Download, print and review c. 13 Ttee.'s Obj to Plan Confirmation, says that ME sn...
6/3/2013	PMS	Billed	0.40	06/03/2013 TC w/ Christine RE Ttee.'s objection. She will speak to Michael about getting the 4...
6/4/2013	PMS	Billed	0.30	06/04/2013 Download, print and review PoC #22 filed by CitiMortgage. This is a late filed claim...
6/6/2013	PMS	Billed	0.10	06/06/2013 Download and print notice of response deadline/hearing on Debtors' Objection to C...
6/6/2013	PMS	Billed	0.10	06/06/2013 RC to Christine at 3.10 PM, LM w/ best times to c.b. today and tom.
6/7/2013	PMS	Billed	0.40	06/07/2013 TC from Chris, answered her ?s RE ME property, student loan payments, applicati...
6/7/2013	PMS	Billed	0.10	06/07/2013 Rev JT's 1st draft of Notice of Hearing and c/s RE Objection to Claim
6/18/2013	PMS	Billed	0.10	06/17/2013 Rev Crt Order RE c. 13 Ttee.'s Obj to Confirmation. Added deadline to Task list.
6/19/2013	PMS	Billed	4.50	06/19/2013 Prepare objection to claim, edit, file. Confer w/ JT RE Notice of Objection and servi...
6/20/2013	PMS	Billed	0.20	06/20/2013 Download, print and review PoC #23 and attachment. Claim is for \$77,448.93 for st...
6/20/2013	PMS	Billed	0.20	06/20/2013 Rev JT's 1st draft of obj to Nelnet claim for US Dept of Educ. Suggested edits, Re...
6/24/2013	PMS	Billed	0.10	06/24/2013 Rev corres from CitiMortgage RE post pet payments in arrears. No property adre...
6/24/2013	PMS	Billed	0.10	06/24/2013 Rev Notice of Post Petition Mortgage Payment Change from BoA. No address spe...
6/28/2013	PMS	Billed	0.10	06/28/2013 Download and print Notice of Hearing [2] on Objections to Claims. Confer w/ JT R...
7/8/2013	PMS	Billed	0.30	06/28/2013 TC from atty Joe Dolben representing Wells Fargo Bank, wants to continue tomorr...
7/8/2013	PMS	Billed	0.10	07/08/2013 rev PoC filed by MDOR for 2012 estimated income taxes. Per JT, her Task list has ...
7/11/2013	PMS	Billed	0.30	07/11/2013 Status review. TC to c. 13 Ttee. RE deadline to file amended plan. Spoke to Leo, tr...
7/12/2013	PMS	Billed	0.50	07/12/2013 TC from Joanne Psilos RE dead;line to file amended Plan and August 20th hearin...

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## Time by Job Detail

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Date	Name	Billing Status	Duration	Notes
7/12/2013	PMS	Billed	0.10	07/12/2013 Download and print Crt Order allowing mo to extend. Update Task list
7/31/2013	PMS	Billed	0.30	07/31/2013 Download, print and review notice of appearance by atty Marcus Pratt of Korde & ...
8/13/2013	PMS	Billed	0.30	08/12/2013 Download, print and review Barbeau response to objection to PoC.
8/16/2013	PMS	Billed	0.10	08/16/2013 TC from atty Joe Dalton RE obj to Wells Fargo claim. Told him I wd c.b. this PM, hi...
8/16/2013	PMS	Billed	0.80	08/16/2013 Rev calendar for Tues. hearings, set up separate files for each of three claims obj...
8/19/2013	PMS	Billed	0.50	08/19/2013 Reply to e-mail from atty Dolben. draft file and serve withdrawal of objection to Po...
8/20/2013	PMS	Billed	0.10	08/19/2013 Download, print and review Crt Order RE withdrawal of Obj to PoC #9 (Wells Fargo).
8/20/2013	PMS	Billed	1.00	08/19/2013 Complete preparations for and attend Crt hearings on Objections to Claims. In ope...
9/5/2013	PMS	Billed	0.20	09/05/2013 Rev VM msg from Denise RE claims objections. RC to her, went over each claim, ...
9/5/2013	PMS	Billed	0.50	09/05/2013 Draft, file and serve Emergency Assented To motion to extend deadline to file ame...
9/5/2013	PMS	Billed	0.20	09/05/2013 RC to atty Champagne, discussed merits of claim and if whether attachment was ...
9/6/2013	PMS	Billed	0.10	09/06/2013 Download and print Crt. Order Allowing motion to extend deadline to file amended ...
9/27/2013	PMS	Billed	0.10	09/27/2013 Download and print Notice of Mortgage Payment change from BoA. No property ad...
12/3/2013	PMS	Billed	0.10	12/03/2013 Status review. TC to Joanne Psilos, left very detailed msg that current deadline to file
12/3/2013	PMS	Billed	0.20	12/03/2013 download, print and review Notice of Appearance and Request for Notice filed by R...
12/3/2013	PMS	Billed	0.30	12/03/2013 e-mail exchange w/ R. Mulligan and Jason Giguere RE Appearance they filed on b...
12/3/2013	PMS	Billed	0.20	12/03/2013 RC from Joanne Psilos, is OK to extend deadline to file amended Plan to June 30t...
12/4/2013	PMS	Billed	0.30	12/04/2013 Draft, file and serve Assented to Expedited Motion to Extend Deadline to File Ame...
12/4/2013	PMS	Billed	0.10	12/04/2013 Download, print and serve Withdrawal of Appearance by R. Mulligan/Harmon on b...
12/5/2013	PMS	Billed	0.40	12/05/2013 Download, print and review Claims Register. Print BestCase summary of claims as...
12/5/2013	PMS	Billed	0.30	12/05/2013 TC from Christine. Says that they need a new accountant, that 2010 and 2011 retur...
12/5/2013	PMS	Billed	0.30	12/05/2013 Rev e-mail/fax from Orlans Moran on behalf of Nationstar alleging that no payment...
12/6/2013	PMS	Billed	0.10	12/06/2013 Forward Brenda Bianculi's contact information to Christine. Rev PACER as to stat...
12/9/2013	PMS	Billed	0.10	12/09/2013 TC from Christine, says she thought they were five months in arrears, told her lette...
12/10/2013	PMS	Billed	0.20	12/10/2013 Rev e-mail from Christine RE Nationstar arrears. Draft and send e-mail to Alisha ...
12/11/2013	PMS	Billed	0.10	12/11/2013 Status review. Per PACER, still no Crt. action on mo to extend deadline to file ame...
12/26/2013	PMS	Billed	0.10	12/26/2013 Download and print Crt. Order allowing mo to extend deadline to file amended Pla...
2/3/2014	PMS	Billed	0.10	02/03/2014 Rev e-mail response from atty Champagne
2/6/2014	PMS	Billed	0.50	02/06/2014 1st review of corres from Denise Pappalardo w/ copies of letter from atty Champag...
2/7/2014	PMS	Billed	0.20	02/07/2014 Confer w/ JT RE prep of chronology of events. Two vehicles not scheduled ere not ...
2/7/2014	PMS	Billed	0.20	02/07/2014 Rev and edit JT's 1st draft of letter to clients RE allegations of unscheduled assets.
2/12/2014	PMS	Billed	0.20	02/12/2014 Confer w/ atty Roy Bourgeois RE professional responsibilities in light of allegations of
2/12/2014	PMS	Billed	0.80	02/12/2014 Confer w/ JT, prepare summary of alleged unscheduled items. RC to Michael, we...
2/12/2014	PMS	Billed	0.10	02/12/2014 Download, print and review Notice of Transferred Claim to Fannie Mae.
2/14/2014	PMS	Billed	0.20	02/14/2014 RC to Denise Pappalardo. went over each alleged "un-scheduled" vehicle. She su...
2/14/2014	PMS	Billed	1.50	02/14/2014 Begin prep of Aff for Michael RE "unscheduled" assets. TC from Christine, discuss...
2/14/2014	PMS	Billed	0.10	02/14/2014 Confer w/ JT RE Wells Fargo modification proposal, she will follow up.
2/14/2014	PMS	Billed	0.20	02/14/2014 TC w/ Wells Fargo rep RE modification. She wants PMS to file for Crt approval bas...
2/18/2014	PMS	Billed	1.00	02/18/2014 Prep mop to approve mortgage modification agreement, scan and attach exhibit. T...
2/18/2014	PMS	Billed	0.10	02/18/2014 Status review, follow up e-mail sent to Christine RE addit info needed to complete ...
2/19/2014	PMS	Billed	0.30	02/19/2014 Rev e-mail w/ edits to Aff. Revise Aff and return to Chris.
2/19/2014	PMS	Billed	0.30	02/19/2014 TC from Michael, say that he will be in around 1.30 PM to sign the Affidavit. Draft c...
2/19/2014	PMS	Billed	0.20	02/19/2014 Confer w/ Michael, rev'd and executed Aff. Discussed his ? RE incorporating, says ...
2/25/2014	PMS	Billed	0.10	02/25/2014 download and print Notice of Appearance filed by Richard Mulligan/Harmon for Gre...
3/7/2014	PMS	Billed	0.20	03/07/2014 Download, print and save Order allowing mo to modify mortgage. Copy e-mailed to...
3/19/2014	PMS	Billed	0.10	03/19/2014 Confer / JT RE mort modification docs rec'd from Wells Fargo. We have Crt. appro...
3/20/2014	PMS	Billed	0.10	03/20/2014 rev JT's 1st draft of letter to clnts RE mortgage modification. Instructed her to send o
4/10/2014	PMS	Billed	0.30	04/10/2014 RC to Christine, says that amended tax returns show a \$70k tax liability. Discussed...
4/11/2014	PMS	Billed	0.10	04/11/2014 rev notice of mortgage payment change from Seterus. No ref as to property addres...
4/25/2014	PMS	Billed	0.20	04/25/2014 Download, print and save mo for relief filed RE 6 Bill Graham. Is scheduled to be s...
5/2/2014	PMS	Billed	0.10	05/02/2014 rev and edit JT's 1st draft of letter to clnts re need to provide monthly income/expe...
5/13/2014	PMS	Billed	0.10	05/13/2014 Download and save Order granting relief RE Bill Graham Lane. Copy forward to Ch...
5/16/2014	PMS	Billed	0.10	05/16/2014 TC from Christine, says that she and Michael are not going to be living together. T...
6/11/2014	PMS	Billed	0.10	06/11/2014 Rev corres [4] from Seterus requesting clnts' SSN's. Confer w. JT RE follow up.
7/8/2014	PMS	Billed	0.10	07/08/2014 Confer w/ JT RE TC from Crt RE need to file amended Plan.
7/8/2014	PMS	Billed	0.30	07/08/2014 TC w/ Joanne Psilos RE extension of deadline to file Amended Plan. OK to extend ...
7/9/2014	PMS	Billed	0.40	07/09/2014 Prep, file and serve mo requesting extension of time to file an amended Plan to De...
7/18/2014	PMS	Billed	0.10	07/18/2014 TC w/ Christine RE implications and process for severing her case and converting ...
7/28/2014	PMS	Billed	0.10	07/28/2014 Rev req for proof of insurance coverage RE 620 Main St. Millbury, confer w/ JT RE...
7/29/2014	PMS	Billed	0.10	07/29/2014 Download and Print Order extending deadline to file an Amended Plan, update Tas...
7/29/2014	PMS	Billed	0.10	07/29/2014 Rev and edit 1st draft of letter to Christine w/ enclosed copy of corres from Seterus...
8/20/2014	PMS	Billed	0.20	08/20/2014 rev and edit 1st draft of letter to clnts RE their need to provide proof of insurance an
8/27/2014	PMS	Billed	0.10	08/27/2014 TC from atty Champagne, says that she will be filing a motion to dismiss or convert...
8/27/2014	PMS	Billed	0.20	08/27/2014 Download and print atty Champagne's motion to dismiss or convert, saved and sen...
8/28/2014	PMS	Billed	0.10	08/28/2014 Download and print notice of hearing RE mo to dismiss, added to Calendar.
8/28/2014	PMS	Billed	0.10	08/28/2014 e-mail sent to Christine to re schedule Tel conf.
8/29/2014	PMS	Billed	0.10	08/29/2014 TC from Christine, says that they have another accountant who is working on the r...
9/2/2014	PMS	Billed	0.10	09/02/2014 rev e-mail from Christine w/ attached doc evidencing proof of insurance on 30 Wat...
9/2/2014	PMS	Billed	0.10	09/02/2014 rev and OK 1st draft of letter to Seterus RE insurance coverage on Water St. Mill b...
9/11/2014	PMS	Billed	2.50	09/11/2014 Begin prep of opposition to mo to dismiss [12.45 ->. Reviewed and replied to e-mai...
9/12/2014	PMS	Billed	1.50	09/12/2014 Continue prep of Opposition to Motion to Dismiss
9/15/2014	PMS	Billed	6.50	09/15/2014 Rev e-mail from Christine / attached Aff from Michael, and reply. Complete draftin...
9/16/2014	PMS	Billed	0.50	09/16/2014 Final edits, confer w/ JT RE filing of exhibits. File and serve [actual time 1.5 hour]
9/16/2014	PMS	Billed	0.20	09/16/2014 Rev notice from Santander that \$1,500 check tendered for deposition expenses wa...
9/17/2014	PMS	Billed	4.00	09/17/2014 travel to S'field and return for hearing on Barbeaus' mo to dismiss. Mo Allowed, du...
9/17/2014	PMS	Billed	0.10	09/17/2014 Download and print Orders dismissing c. 13 case and canceling trial on adversary ...
9/17/2014	PMS	Billed	0.10	09/17/2014 TC from Mike, told him that a motion for reconsideration could be filed, but only if mis
9/18/2014	PMS	Billed	0.20	09/18/2014 RC to Mike, discussed go forward options. Told him that there were \$200k in claim...

## Time by Job Detail

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Date	Name	Billing Status	Duration	Notes
9/18/2014	PMS	Billed	0.30	09/18/2014 TC from Christine. Went over options, incl her ? RE transferring title to ME property...
9/19/2014	PMS	Not Billable	0.20	09/19/2014 Reorganize files.
9/22/2014	PMS	Billed	0.10	09/22/2014 TC to D. Pappalardo, left detailed msg on her VM advising that Debtors wished to ...
9/23/2014	PMS	Billed	0.10	09/23/2014 Rev e-mail from Christine, says operating reports will be ready on Wed.
9/26/2014	PMS	Billed	0.30	09/26/2014 Rev e-mail from Christine w/attached P & L statements for 2013 and 2014. replied ...
9/26/2014	PMS	Billed	1.50	09/26/2014 Research basis to vacate dismissal. Prep mo to vacate, w/ exhibits, file and serve. ...
9/29/2014	PMS	Billed	0.10	09/29/2014 Download, print and rev Crt Order of Deficiency RE c/s on mo to reconsider. Confe...
Total Hourly			60.30	
<b>Paralegal</b>				
3/5/2013	Paralegal	Billed	0.50	3/5/13 - Prepare draft Obj to Claim #5. Review w/PMS.
3/6/2013	Paralegal	Billed	0.50	3/6/13 - Prepare obj to Claim # 5 in final form making changes to Certificate of Service, File with
3/6/2013	Paralegal	Billed	0.50	3/6/13 - Prepare DSO and letter to client to review and sign DSO and return to this office to file
3/12/2013	Paralegal	Billed	0.75	3/12/13 - Prepare draft Notice of Hearing re obj to claim #5, review w/PMS, prepare in final, file
3/18/2013	Paralegal	Billed	0.50	3/18/13 - scan DSO and Amended 22 C, file with Court.
3/26/2013	Paralegal	Billed	0.50	3/26/13 - Prepare draft Objection to Proof of Claim #9 filed by Wells Fargo
3/26/2013	Paralegal	Billed	0.25	3/26/13 - Prepare objection to Claim # 9 in final, file with Court and mail to service list.
4/2/2013	Paralegal	Billed	0.50	4/2/13 - prepare Notice of Hearing on Obj to Claim #9, file with Court and mail to interested parti
5/14/2013	Paralegal	Billed	0.40	5/14/13 - prepare authorization for Wells Fargo to speak to debtors directly, faxed to Wells Fargo
6/7/2013	Paralegal	Billed	0.50	6/7/13 - Prepare Notice of Hearing on Obj to POC #23 and draft Notice of Hearing on Obj ...
6/20/2013	Paralegal	Billed	0.50	6/20/13 - Prepare Obj to POC #23 filed by Nelnet on behalf of US Dept of Education, file with C...
6/25/2013	Paralegal	Billed	0.30	6/25/13 - Prepare and send letter to clients with copy of letter from CitiMortgage re mortgage p...
7/2/2013	Paralegal	Billed	0.80	7/2/13 - Prepare draft Notice of Hearing on Obj to POC #23 and Notice of Hearing on Obj to PO...
7/8/2013	Paralegal	Billed	0.80	7/8/13 - prepare final Notice of Hearing on Obj to POC #23 and Notice of Hearing on Obj to PO...
7/10/2013	Paralegal	Billed	0.30	7/10/13 - Prepare and send letter to clients with copy of POC filed by MDOR re estimated 2012...
10/21/2013	Paralegal	Billed	0.20	10/21/13 - Prepared draft letter to clients looking for 2012 income tax returns.
10/21/2013	Paralegal	Billed	0.30	10/21/13 - prepare and send letter to Michael and Christine looking for their 2012 income tax re...
12/4/2013	Paralegal	Billed	0.40	12/4/13 - Prepare Supplemental Certificate of Service re Debtors' Motion to Extend Deadline to...
1/16/2014	Paralegal	Billed	0.50	1/16/14 - prepare draft Notice of Change of Address for Michael to correct his address with Co...
1/17/2014	Paralegal	Billed	0.50	1/17/14 - prepare and send letter to both debtors with copy of letter from CitiMortgage informin...
2/4/2014	Paralegal	Billed	0.40	2/4/14 - prepare and mail letters to Michael and Christine Schold with copy of modification prop...
2/6/2014	Paralegal	Billed	0.50	2/6/14 - review list of unscheduled assets and compare to debtors' schedule B. look through fi...
2/6/2014	Paralegal	Billed	0.40	2/6/14 - prepare draft letter to Scholds re letter from ch 13 Trustee re allegations of unscheduled
2/7/2014	Paralegal	Billed	0.30	2/7/14 - make change to letter to clients re unscheduled assets. Mail to both debtors.
2/7/2014	Paralegal	Billed	0.50	2/7/14 - review file and time entries. Prepare chronology of events re personal property listed on
3/7/2014	Paralegal	Billed	0.30	3/7/14 - prepare and send letter to Wells Fargo with copy of Court Order allowing Mo/approve ...
3/21/2014	Paralegal	Billed	0.30	3/21/14 - prepare and send letter to Christine Schold with modification packet from Wells Farg...
4/2/2014	Paralegal	Billed	0.30	4/2/14 - prepare draft letter to clients with copy of new mortgage payment notice from Seterus
4/7/2014	Paralegal	Billed	0.40	4/7/14 - prepare and send letters to Michael Schold and Christine Schold sending them each a ...
5/2/2014	Paralegal	Billed	0.30	5/2/14 - prepare and send letter to clients re monthl reports to chapter 13 trustee.
6/12/2014	Paralegal	Billed	0.50	6/12/14 - prepare letters to Michael Schold and Christine Schold enclosing letter and W-9 from ...
7/18/2014	Paralegal	Billed	0.10	7/18/14 - prepare and send follow up e-mail to Christine Schold about scheduling date and tim...
7/21/2014	Paralegal	Billed	0.10	7/21/14 - receive email from Christine re PMS availability for Thursday afternoon to go with her t
7/28/2014	Paralegal	Billed	0.30	7/28/14 - prepare and send letter to Seterus with W-9 Forms signed by Michael and Christine.
7/29/2014	Paralegal	Billed	0.30	7/29/14 - prepare and send letter to Christine Schold with letter from Seterus looking for hazard i
8/20/2014	Paralegal	Billed	0.30	8/20/14 - prepare and send letters to Michael and Christine Schold following up on our letters to t
9/2/2014	Paralegal	Billed	0.30	9/2/14 - prepare and send letter to Seterus with hazard insurance info for 30 Waters Street pro...
9/30/2014	Paralegal	Billed	0.10	9/30/14 - TC with Paula at Bankruptcy Court re deficiency notice on certificate of service for mo/v
9/30/2014	Paralegal	Billed	0.50	9/30/14 - prepare draft supplemental certificate of service on mo/to vacate dismissal.
9/30/2014	Paralegal	Billed	0.50	9/30/14 - prepare Supplemental Certificate of Service in final and file with Court. Make 49 copies
Total Paralegal			16.20	
Total Schold, Michael dba Schold Builders: Sectio...			76.50	
<b>Schold, Michael dba Schold Builders:Section II matters:Adversary Proceeding</b>				
<b>Hourly</b>				
5/31/2013	PMS	Billed	0.80	05/31/2013 Status review. Per PACER, atty Champagne filed a return of service on the summo...
6/12/2013	PMS	Billed	0.30	06/12/2013 RC to atty Nadine Champagne, she will e-mail a copy of the amended Complaint t...
6/13/2013	PMS	Billed	1.00	06/13/2013 Begin legal research RE response to Amended Complaint.
6/14/2013	PMS	Billed	1.00	06/14/2013 Rev docs from client, Exhibits to Complaint. Prepare Excel spreadsheet of project ...
6/17/2013	PMS	Billed	0.10	06/17/2013 Follow up e-mail sent to Christine RE accounting summary of Barbeau claim.
6/18/2013	PMS	Billed	0.10	06/18/2013 1st review of response to e-mail from Christine.
6/18/2013	PMS	Billed	0.50	06/18/2013 Rev e-mail from Christine, Rev'd file and extracted hand written doc. Scanned and ...
6/20/2013	PMS	Billed	0.30	06/20/2013 Legal research, requested copy of case and 2005 article from Boston Bar Assoc Jo...
6/24/2013	PMS	Billed	0.30	06/24/2013 Unscheduled office visit by Michael. Dropped off photos of site work, and complete...
6/28/2013	PMS	Billed	0.20	06/28/2013 TC from atty Nadine Champagne. Says that their intention is to file an amended Co...
6/28/2013	PMS	Billed	0.10	06/28/2013 Download and print Notice of Hearing RE motion to strike. Confer w/. JT RE prep o...
7/8/2013	PMS	Billed	0.10	07/08/2013 Rev's mo filed by atty Champagne seeking leave to file amended complaint. Pleadi...
7/22/2013	PMS	Billed	0.10	07/22/2013 Download and print Crt Order allowing mo to amend complaint.
7/29/2013	PMS	Billed	0.40	07/29/2013 e-mail sent to atty Champagne asking about status of 2nd amended complaint. Re...
7/31/2013	PMS	Billed	2.00	07/30/2013 Prepare answer and counterclaim [w/ Exhibits] to Second Amended Complaint, file...
8/20/2013	PMS	Billed	0.10	08/20/2013 Rev and reply to e-mail fro Christine RE Barbeau adversary.
9/5/2013	PMS	Billed	0.70	09/05/2013 Rev docket, no answer to counterclaim has been filed. Download and print pre-trial...
9/6/2013	PMS	Billed	0.10	09/06/2013 Download and print Notice of Deficiency, TC to Paula at Bankr Crt.. says that Cha...
9/18/2013	PMS	Billed	0.20	09/18/2013 Download, print and review atty Champagne's opposition to entry of default, and pr...
9/27/2013	PMS	Billed	0.10	09/27/2013 Download, print and review Notice of Hearing RE Req for Entry of Default.
10/1/2013	PMS	Billed	0.10	10/01/2013 Rev and reply to e-mail from atty Champagne RE scheduling conf call.
10/2/2013	PMS	Billed	0.10	10/02/2013 Rev e-mail from atty Champagne, update calendar for conference call today.

## Time by Job Detail

April 30, 1993 through September 30, 2014

3:17 PM

10/29/14

Date	Name	Billing Status	Duration	Notes
10/2/2013	PMS	Billed	0.20	10/02/2013 Prep for Tel call from atty Champagne, review Crt. Pre-Trial Order.
10/2/2013	PMS	Billed	0.30	10/02/2013 Conf call w/ attys Champagne and Levine-Piro. Told them it was my intention to file...
10/2/2013	PMS	Billed	0.30	10/02/2013 Rev Registry of Deeds records. Print some as needed. There is no record of any d...
10/3/2013	PMS	Billed	0.30	10/03/2013 Draft and edit e-mail to atty Champagne w/ attached .pdf file of Worc. Registry of D...
10/8/2013	PMS	Billed	0.10	10/08/2013 Follow up e-mail sent to atty Champagne RE Reg of Deeds search on Schold Build...
10/8/2013	PMS	Billed	0.10	10/08/2013 TC from atty Champagne, says that their position as to validity of lien is unchange...
10/10/2013	PMS	Billed	2.75	10/10/2013 Begin prep of mo for partial summary j'ment/j'ment on the pleadings.
10/11/2013	PMS	Billed	5.20	10/11/2013 Complete brief RE mo for partial summ j'ment/j'ment on pleadings. File mo and m...
10/15/2013	PMS	Not Billable	0.20	10/15/2013 update file.
10/17/2013	PMS	Billed	0.30	10/17/2013 Download, print and review Crt Order RE mo for partial s.j. Set for hearing 11/12/1...
10/18/2013	PMS	Billed	0.10	10/18/2013 Rev and reply to e-mail from Chris.
10/30/2013	PMS	Billed	0.20	10/30/2013 Download, print and save Defs Opp to Mo for Partial Summary J'ment. Copies e-...
10/30/2013	PMS	Billed	0.50	10/30/2013 Review memo in opposition to mo for partial s.j. Argument about 6 Bill Graham is ...
11/8/2013	PMS	Billed	0.10	11/08/2013 Rev file for hearing on Tues. Confirmed time.
11/12/2013	PMS	Billed	1.50	11/12/2013 Prep for and attend Crt hearing on mo for partial s.j. Allowed in part [claim, if any is
11/12/2013	PMS	Billed	0.10	11/12/2013 Download, print and review Crt Orders on motions.
11/13/2013	PMS	Billed	0.40	11/13/2013 Download, print and save 2nd Pre Trial Order. Rev sec. 109 as to current unsecure...
11/15/2013	PMS	Billed	0.20	11/15/2013 Update Task list as to follow up w/ Plntfs' atty. Draft and edit e-mail to Joanne Psilos
12/2/2013	PMS	Billed	0.20	12/02/2013 Draft and edit e-mail to atty Champagne, bcc: Christine.
12/2/2013	PMS	Billed	0.20	12/02/2013 Review and reply to e-mail from atty Champagne.
12/2/2013	PMS	Billed	0.10	12/02/2013 Rev and reply to e-mail from atty Champagne.
12/3/2013	PMS	Billed	0.30	12/03/2013 Rev e-mail from atty Piro Levine w/ ints/doc req in .pdf format. Replied asking that ...
12/5/2013	PMS	Billed	0.20	12/05/2013 TC w/ Christine, went over prep of responses to discovery, told her to focus on ints,...
12/30/2013	PMS	Billed	0.30	12/30/2013 rev e-mail from Christine w/ draft answers in Excel format to ints.
1/14/2014	PMS	Billed	0.10	01/14/2014 Rev and reply to e-mail from atty Piro Levine RE status of Def's responses to ints.
1/15/2014	PMS	Billed	1.50	01/15/2014 Rev JT's entry of data into 1st draft of responses to ints, continue prep of responses,
1/21/2014	PMS	Billed	0.80	01/21/2014 rev e-mails from Christine, revise draft answers to ints. and return to her for their f
1/24/2014	PMS	Billed	0.50	01/24/2014 Final edits to answers to ints, prep c/s, sent ans via e-mail to atty Piro Levine, w/ cc
1/27/2014	PMS	Billed	1.50	01/27/2014 Prep Def's 1st Ints to Plaintiffs, pleadings e-mailed to: nadine@nadinechampagn...
1/28/2014	PMS	Billed	1.90	01/28/2014 Begin prep of requests for admission.
1/28/2014	PMS	Billed	0.30	01/28/2014 Compile docs to be attached to Req for Admissions, confer RE scanning of photos.
1/29/2014	PMS	Billed	1.00	01/29/2014 Download scanned photos, complete Req for Admissions, discussed redactions of do...
2/3/2014	PMS	Billed	0.10	02/03/2014 Rev and reply to e-mail from atty Champagne, advised I would respond to docume...
2/4/2014	PMS	Billed	0.10	02/04/2014 TC from D. Pappalardo, says that Barbeaus hired a private investigator who has pr...
2/14/2014	PMS	Billed	0.10	02/14/2014 Rev and reply to e-mail from atty Champagne requesting additional time to respon...
2/18/2014	PMS	Billed	0.10	02/18/2014 Begin prep of response to doc request
2/20/2014	PMS	Billed	1.00	02/20/2014 Continue prep of response to doc request. Serve via e-mail, c/s only filed by ECF.
2/20/2014	PMS	Billed	0.10	02/20/2014 Rev and OK 1ts draft of cover letter to atty Champagne, discussed redactions of do...
2/26/2014	PMS	Billed	0.10	02/26/2014 rev e-mail from atty Champagne requesting a conference to schedule a deposition ...
3/12/2014	PMS	Billed	2.20	03/12/2014 Draft mo for j'ment on the pleadings based upon Plntffs' failure to answer Req for...
3/12/2014	PMS	Billed	0.40	03/12/2014 Download, print and review Crt. Notice of Deficiency. TC to Paula, says that Plntffs...
3/12/2014	PMS	Billed	0.10	03/12/2014 download, print and 1st review of Plntf's emer mo to extend discovery schedule.
3/13/2014	PMS	Billed	0.40	03/13/2014 Download, print and review Crt Order setting hearing for tomorrow at 10 AM in Spr...
3/13/2014	PMS	Billed	0.10	03/13/2014 Confer w/ JT, rev'd 1st draft of notice and c/s, e-mail and fax cvr sheet to atty Piro
3/13/2014	PMS	Billed	1.00	03/13/2014 draft file and serve response to Plntff's emergency mo to extend discovery deadline...
3/13/2014	PMS	Billed	1.00	03/13/2014 Download, print and review Docket as to Case No. 13-04026. Prep for tomorrow's ...
3/14/2014	PMS	Billed	3.50	03/13/2014 Travel to S'field and return for emergency hearing on Plntffs' mo to compel discov...
3/14/2014	PMS	Billed	0.20	03/14/2014 Download and print J. Boroff's Order Re this AM's hearing.
3/17/2014	PMS	Billed	0.40	03/17/2014 Review list of mediators maintained by Bank Ctr., many are retired state court judg...
3/21/2014	PMS	Billed	0.10	03/21/2014 TC w/ atty Aframe RE possible mediators.
3/21/2014	PMS	Billed	0.10	03/21/2014 Rev reply to e-mail from atty Champagne.
3/21/2014	PMS	Billed	1.30	03/21/2014 Rev file, compile summary of discovery related events. Draft and edit detailed e-m...
3/25/2014	PMS	Billed	0.90	03/25/2014 Rev e-mails from Nadine. Rev Crt Order, draft and edit response.
3/25/2014	PMS	Billed	0.10	03/25/2014 e-mail sent to Christine Schold RE pending discovery issues.
3/26/2014	PMS	Billed	0.10	03/26/2014 1st rev of e-mail from atty Champagne, says that they agree w/ PMS's analysis of J...
3/27/2014	PMS	Billed	0.80	03/27/2014 Draft joint statement to be filed w/ Crt., and Memorandum regarding discovery issu...
3/27/2014	PMS	Billed	0.20	03/27/2014 Rev and reply to e-mail from atty Champagne RE discovery issues, bcc: Christine
3/28/2014	PMS	Billed	0.30	03/28/2014 TC from Christine. Discussed status of discovery, production of docs, possible outc...
3/28/2014	PMS	Billed	0.30	03/28/2014 Rev and reply to e-mail from atty Champagne.
3/28/2014	PMS	Billed	0.30	03/28/2014 Revise Agreement and e-mail to atty Champagne for her OK.
3/28/2014	PMS	Billed	0.10	03/28/2014 Rev and reply to e-mail from atty Champagne w/ instruction as to filing after 2.30 PM
3/28/2014	PMS	Billed	0.30	03/28/2014 Final edits to Jt Statement, convert and attach .pdf file. File w/ Bankr Crt. e-mailed d
4/4/2014	PMS	Billed	0.10	04/04/2014 Download, print and review Crt Order RE discovery dispute. 4/10 hearing is cancel...
4/7/2014	PMS	Billed	0.10	04/07/2014 Status review. e-mail sent to Christine Schold asking about status of her efforts to ...
4/8/2014	PMS	Billed	0.10	04/08/2014 Review and reply to e-mail from Christine., docs will be dropped off this afternoon, ...
4/9/2014	PMS	Billed	0.20	04/09/2014 draft and edit e-mail to atty Champagne RE Plntffs failure to comply w/ agreed dea...
4/10/2014	PMS	Billed	0.50	04/10/2014 1st review of e-mails from atty Piro Levine w/ Plntffs' answers to ints and req for Ad...
4/11/2014	PMS	Billed	0.20	04/11/2014 Confer [2x] w/ JT RE status of docs Mike was to have dropped off, and copying. Dir...
4/17/2014	PMS	Billed	0.40	04/17/2014 rev and reply to e-mail from atty Champagne.
4/17/2014	PMS	Billed	0.20	04/17/2014 Rev and reply to e-mail from atty Piro Levine.
4/29/2014	PMS	Billed	0.20	04/29/2014 e-mail sent to Chris RE mtg, replied to e-mail from atty Champagne.
4/30/2014	PMS	Billed	0.20	04/30/2014 TC from Christine. They will review the claims for additional payments made by ho...
4/30/2014	PMS	Billed	0.40	04/30/2014 Rev e-mail from attorney Champagne. Draft, and edit, reply w/ bcc: to Christine Sc...
5/1/2014	PMS	Billed	0.40	05/01/2014 Download, save and review Pltffs' mo to take R. 2004 examination of Christine w/ a...
5/2/2014	PMS	Billed	0.40	05/02/2014 RC to Christine RE response to motion to take a R. 2004 exam of her. Decided th...
5/2/2014	PMS	Billed	0.20	05/02/2014 Download, save and review mo to take R 2004 exam of Millbury Savings Bank. C...
5/2/2014	PMS	Billed	0.20	05/02/2014 Download, print and review Crt Orders denying motions to take R. 2004 exams. Re...
5/5/2014	PMS	Billed	0.10	05/05/2014 RC to atty Champagne @ 1 PM, LM w/ best times to call back.



## Time by Job Detail

April 30, 1993 through September 30, 2014

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10/29/14

Date	Name	Billing Status	Duration	Notes
5/6/2014	PMS	Billed	0.10	05/06/2014 RC to atty Champagne @ 11.54 AM. Busy, no way to leave msg. 2nd attempt, LM ...
5/6/2014	PMS	Billed	0.20	05/06/2014 RC from atty Champagne. Says she will be re-filing motions to examine in a proced...
5/7/2014	PMS	Billed	0.10	05/07/2014 Status review. e-mail sent to Christine asking about spreadsheet that PMS was to ...
5/16/2014	PMS	Billed	0.10	05/16/2014 TC from Christine, says that she was served w/ subpoena to be deposed. Told her ...
5/16/2014	PMS	Billed	0.50	05/16/2014 rev e-mail w/ attachments from atty Champagne RE depo of Christine and request ...
5/19/2014	PMS	Billed	0.20	05/19/2014 Rev docket, and J. Boroff's Order dtd 3/14/14. Replied to e-mail from atty Champa...
5/19/2014	PMS	Billed	0.10	05/19/2014 Rev and reply to e-mail from atty Champagne RE date of taking Christine's depositi...
5/19/2014	PMS	Billed	0.10	05/19/2014 Rev e-mails [2] from atty Champagne.
5/21/2014	PMS	Billed	1.50	05/21/2014 e-mail exchange w/ atty Champagne re conducting depo at PMS's office next Tues...
5/22/2014	PMS	Billed	0.10	05/22/2014 Rev and reply to e-mail from atty Champagne, cc: Piro Levine, bcc: Christine Schold...
5/23/2014	PMS	Billed	0.40	05/23/2014 Rev msg, e-mail from atty Champagne. Location of deposition has been moved to ...
5/23/2014	PMS	Billed	0.75	05/23/2014 Prep response to Subpoena to Produce Documents RE Christine Schold. Scan an...
5/27/2014	PMS	Billed	4.80	05/23/2014 Travel to Northborough, confer w/ Christine in prep for her exam. Attend R 2004 ex...
5/29/2014	PMS	Billed	0.30	05/29/2014 Rev e-mail from Nadine Champagne. Has lengthy attachment RE mold/dampness ...
5/30/2014	PMS	Billed	0.40	05/30/2014 2nd review of e-mail attachments from atty Champagne. Housing Crt case was file...
6/5/2014	PMS	Billed	0.40	06/05/2014 TC from Denise Pappalardo regarding her 40 minute conversation w/ atty Nadine ...
6/5/2014	PMS	Billed	0.10	06/05/2014 Rev e-mail from atty Champagne RE taking of Mike's deposition on 6/24. Replied t...
6/6/2014	PMS	Billed	0.10	06/06/2014 rev and reply to e-mail fro atty Champagne RE possible dates to take Michael's de...
6/16/2014	PMS	Billed	0.30	06/16/2014 Prep for tomorrow's status conference hearing
6/17/2014	PMS	Billed	0.20	06/17/2014 Final prep for today's status conference.
6/17/2014	PMS	Billed	3.30	06/17/2014 Travel to S'field and return for status/pre-trial conf. Advised J. Boroff that we were s...
6/18/2014	PMS	Billed	0.20	06/18/2014 rev docs produced by Millbury Savings Bank in response to Plntffs' subpoena. THE...
6/19/2014	PMS	Billed	0.10	06/19/2014 e-mail sent to Christine asking that she call Friday to discuss possible steps toward...
6/20/2014	PMS	Billed	0.40	06/20/2014 TC from Christine. Discussed status conference, and Plntffs' interest in settlement. ...
6/23/2014	PMS	Billed	0.30	06/23/2014 1st review of e-mail w/ attached spreadsheet from Christine addressing issues of al...
6/23/2014	PMS	Billed	0.40	06/23/2014 rev e-mail from atty Piro Levine, and reply advising I had mtg w/ Christine Schold s...
6/23/2014	PMS	Billed	0.10	06/23/2014 rev e-mail from Christine, she can leave at 4 PM. e-mail sent to atty Levine
6/24/2014	PMS	Billed	0.20	06/24/2014 Scan Christine's spreadsheet, forward via e-mail to Melissa, asked when she woul...
6/24/2014	PMS	Billed	1.30	06/24/2014 Prepare for meeting w/ Christine. Confer w/ her, rev'd accounting. See notes. PMS...
6/25/2014	PMS	Billed	1.30	06/25/2014 Draft response to settlement demand to atty Piro Levine. Forward via e-mail to Chri...
6/26/2014	PMS	Billed	0.60	06/26/2014 TC w/ Christine RE calculations and final edits. Complete letter to atty Levine Piro, ...
6/27/2014	PMS	Billed	0.10	06/27/2014 rev e-mail from atty Levine Piro saying that settlement offer was rejected and that ...
7/7/2014	PMS	Billed	0.20	07/07/2014 rev e-mails from attys Levine Piro and Champagne RE taking of Michael's depositi...
7/7/2014	PMS	Billed	0.50	07/07/2014 rev e-mails from attys Champagne and Levine-Piro RE taking of Michael's depositi...
7/8/2014	PMS	Billed	0.10	07/08/2014 Confer w/ Steve Reynolds RE going forward to trial and need for new pre-trial dead...
7/10/2014	PMS	Billed	0.60	07/10/2014 Rev e-mail from atty Levine-Piro. Draft and edit response, cc: atty Champagne, bcc...
7/14/2014	PMS	Billed	0.10	07/14/2014 Rev JT's 1st draft of e-mail to Christine RE review and signing of transcript.
7/14/2014	PMS	Billed	0.30	07/14/2014 RC to Mike, LM at 2.25 PM w/ best times to c.b. RC from him, he is available 7/25/...
7/14/2014	PMS	Billed	0.10	07/14/2014 Rev e-mail from Nadine Champagne RE scheduling deposition of the Barbeaus.
7/18/2014	PMS	Billed	0.10	07/18/2014 Rev and reply to e-mail from atty Champagne RE depositions.
7/18/2014	PMS	Billed	0.30	07/18/2014 TC from Christine RE reading/signing of transcript of her deposition. Flynn now say...
7/22/2014	PMS	Billed	0.80	07/22/2014 Rev Calendar, rev BR 7030. Prep notices of depositions for Arthur Barbeau and Eli...
7/22/2014	PMS	Billed	1.50	07/22/2014 Rev Crt's Nov pre-trial order, note to JT. Begin prep for depositions for Barbeaus, g...
7/23/2014	PMS	Billed	0.10	07/23/2014 1st rev of e-mail from atty Champagne RE depositions.
7/23/2014	PMS	Billed	0.10	07/23/2014 rev e-mail from Christine, says that Flynn Reporting will be mailing her a condense...
7/24/2014	PMS	Billed	0.50	07/24/2014 Rev Fed Rules as to requirement for notice of depositions. Mass Rules require 7 d...
7/24/2014	PMS	Billed	1.80	07/24/2014 Confer w/ clnt, prep for tomorrow's deposition. Rev e-mail from atty Piro Levine, sa...
7/25/2014	PMS	Billed	4.00	07/25/2014 Confer w/ clnt, attend his deposition, conferred w/ him afterwards. PMS to call atty ...
7/25/2014	PMS	Billed	0.50	07/25/2014 Begin title rundown on Sholan Circle property. Margin references on two deeds ref...
7/28/2014	PMS	Billed	1.80	07/28/2014 Research atty Champagne's prior BK experience, it is minimal. 20 cases virtually al...
7/28/2014	PMS	Billed	0.40	07/28/2014 Rev'd ans to ints, obtained Plntffs' current address. Raleigh Durham is closest airp...
7/28/2014	PMS	Billed	0.10	07/28/2014 Rev msg, e-mail from atty Piro Levine, says she will away on vacation after today.
7/28/2014	PMS	Billed	0.70	07/28/2014 TC @ 4.19 PM to atty Piro Levine. Phone answered by "Jeannie", "will you hold , pl...
7/29/2014	PMS	Billed	0.20	07/29/2014 Rev and reply to e-mail from atty Piro Levine, bcc: Christine.
7/29/2014	PMS	Billed	0.70	07/29/2014 TC from Christine RE allowance issues [3] rev e-mail from atty Piro Levine, draft a...
7/29/2014	PMS	Billed	0.20	07/29/2014 Page [2x] through docs previously produced to atty Piro Levine, unable to locate co...
7/30/2014	PMS	Billed	0.10	07/30/2014 rev e-mail from atty Piro Levine RE Naylor Kitchen allowances, forward to Christine.
7/30/2014	PMS	Billed	0.10	07/30/2014 rev e-mail from Christine RE kitchen supplier.
7/30/2014	PMS	Billed	0.70	07/30/2014 Re-file all docs, set up new files. Download and print mo to quash filed by atty Cha...
8/1/2014	PMS	Billed	0.40	08/01/2014 Draft file and serve expedited mo to extend deadline to file response to mo to quas...
8/1/2014	PMS	Billed	0.20	08/01/2014 Download and print J. Boroff's Orders RE taking of depositions by video. Confer w/...
8/13/2014	PMS	Billed	2.00	08/13/2014 Conferred w/ JT and rev'd research RE address of McDermott Enterprises (not pro...
8/13/2014	PMS	Not Billable	0.50	08/13/2014 Hand deliver subpoenas [2] to Worc County Sheriff for service on Dufresnes and M...
8/13/2014	PMS	Billed	0.20	08/13/2014 Preliminary research RE elements of abuse of process, download and print SJC de...
8/15/2014	PMS	Billed	0.20	08/15/2014 rev and reply to e-mail atty Piro-Levine, bcc: Christine Schold. Declined to withdra...
8/15/2014	PMS	Billed	0.40	08/15/2014 Confer w/ JT re logistics of scheduling video deposition. Draft and send e-mail to a...
8/15/2014	PMS	Billed	0.30	08/15/2014 Rev and reply to e-mail from atty Piro Levine. Included text of J. Boroff's order in e-m...
8/15/2014	PMS	Billed	0.50	08/15/2014 Prelim research RE application of work-product doctrine to McDermott [contractor]...
8/18/2014	PMS	Billed	0.10	08/18/2014 rev and reply to e-mail from atty Piro Levine RE scheduling of taking video depositi...
8/18/2014	PMS	Billed	0.20	08/18/2014 Rev e-mail from atty Piro Levine RE deposition of expert witness McDermott. Rev'...
8/19/2014	PMS	Billed	0.10	08/19/2014 Rev Sheriff's return of service of subpoenas upon Corey and Conrad Dufresne, an...
8/22/2014	PMS	Billed	0.40	08/22/2014 Rev and reply to e-mail from atty Piro Levine RE document subpoena served on M...
8/22/2014	PMS	Billed	0.10	08/22/2014 Confer w/ JT RE her conversations with McCarthy RE setting up video depositions...
8/25/2014	PMS	Billed	0.40	08/25/2014 Rev e-mail from Sean at McCarthy Reporting w/ details of 9/5 depo. Forward to att...
8/29/2014	PMS	Billed	0.20	08/29/2014 TC w/ Christine RE depositions scheduled for Friday. Told her I wd need \$ for cost...
8/29/2014	PMS	Billed	0.10	08/29/2014 rev e-mail from atty Piro Levine asking if depos are going forward in light of the mo to
8/29/2014	PMS	Billed	0.20	08/29/2014 1st review of e-mail from Corey Dufresne w/ objection to producing documents res...
9/2/2014	PMS	Billed	0.30	09/02/2014 Rev Corey Dufresne's Obj to Document Subpoena. Rev MLBR R. 7037, draft and ...



Philip M. Stone, Esq.

## Time by Job Detail

April 30, 1993 through September 30, 2014

3:17 PM

10/29/14

Date	Name	Billing Status	Duration	Notes
9/2/2014	PMS	Billed	2.30	09/02/2014 Continue depo prep. Extracted copies of docs to be pre-marked as Exhibits, and p...
9/3/2014	PMS	Billed	0.40	09/03/2014 Draft cover letter to Business Center manager enclosing exhibits for Friday mornin...
9/4/2014	PMS	Billed	0.20	09/03/2014 rev and reply to e-mail from Christine, confirmed that depositions are going forward...
9/4/2014	PMS	Billed	1.70	09/04/2014 Prepare outline of deposition questions
9/4/2014	PMS	Billed	0.80	09/04/2014 Confirm Fed Ex delivery of depo docs to Cary, NC. Draft and send e-mail to atty Le...
9/5/2014	PMS	Billed	2.30	09/05/2014 Conduct depositions of Elizabeth and Arthur Barbeau.
9/5/2014	PMS	Billed	0.10	09/05/2014 TC to Corey Dufresne @ 978.284.2812, left detailed msg RE docs, advising that Ar...
9/8/2014	PMS	Billed	1.30	09/08/2014 Rev and organize discovery sub files, confer w/ JT. Corey Dufresne has not returne...
9/9/2014	PMS	Billed	0.20	09/09/2014 TC to McCarthy Reporting. Per Sean, transcript will be ready on Thursday. They wil...
9/9/2014	PMS	Billed	0.20	09/09/2014 TC from Michael w/ ?s about the depositions taken of the Barbeaus. Gave him upd...
9/10/2014	PMS	Billed	1.00	09/10/2014 Confer w. clnts RE status of adversary proceeding, responses to mo to dismiss, C...
9/12/2014	PMS	Billed	0.70	09/12/2014 rev e-mail from Carol at McCarthy Reporting w/ attached deposition transcripts in ...
9/12/2014	PMS	Billed	0.10	09/12/2014 RC from Corey Dufresne RE doc subpoena. Agreed he will produce docs responsi...
9/16/2014	PMS	Billed	0.30	09/16/2014 e-mail exchange w/ atty Levine Piro RE depo docs w she was to have provided to ...
9/17/2014	PMS	Billed	0.10	09/17/2014 Confer w/ JT RE replacement bank check dropped off by Michael.
Total Hourly			104.30	
<b>Paralegal</b>				
7/2/2013	Paralegal	Billed	0.50	7/2/13 - prepare draft Notice of Hearing on Motion to Strike Amended Complaint.
7/8/2013	Paralegal	Billed	0.40	7/8/13 - Prepare final Notice of Hearing on Motion to Strike Amended Complaint, file with Court...
9/6/2013	Paralegal	Billed	0.50	9/6/13 - prepare Supplemental Certificate of Service. Mail copies of Request for Entry of Default
10/1/2013	Paralegal	Billed	0.50	10/1/13 - Prepare Notice of Hearing on Request for Entry of Default, mail to interested parties a...
1/14/2014	Paralegal	Billed	1.00	work on draft answers to interrogatories using informations sent by Christine Schold.
2/20/2014	Paralegal	Billed	0.50	2/20/14 - make copies of documents to send in response to Request No. 8 of Production of Do...
3/13/2014	Paralegal	Billed	1.00	3/13/14 - prepare notice of hearing on Motion of Michael Schold for Judgment on the Pleadings...
4/8/2014	Paralegal	Billed	0.10	4/8/14 - Christine Schold came to the office with copies of bank statements except for trucking ...
4/10/2014	Paralegal	Billed	2.00	4/10/14 - make copies of all bank statements dropped off by client. clip by account and year.
4/11/2014	Paralegal	Billed	1.50	4/11/14 - make copies of additional documents - tax returns and invoices.
4/11/2014	Paralegal	Billed	0.40	4/11/14 - prepare and send letter to Melissa Levine-Piro, Esq with copies of documents re requ...
6/12/2014	Paralegal	Billed	0.10	6/12/14 - Obtain docket report on pacer to confirm date/location of pre-trial. Hearing is schedule
6/12/2014	Paralegal	Billed	0.10	6/12/14 - TC with Paula at Bankruptcy Court re confirm date/time of pre-trial. She explained that
7/14/2014	Paralegal	Billed	0.10	7/14/14 - TC with Flynn Reporting re date and time for Christine Schold to review and sign her ...
7/14/2014	Paralegal	Billed	0.20	7/14/14 - prepare and send e-mail to Christine with contact info for Flynn Reporting to schedule...
7/24/2014	Paralegal	Billed	0.10	7/24/14 - TC with Michael. Told him we need copy of everything he was served. He will fax it o...
7/24/2014	Paralegal	Billed	0.10	7/24/14 - TC with Michael. Told him depo is scheduled to start at 10:00 a.m. PMS will meet hi...
8/22/2014	Paralegal	Billed	0.10	8/22/14 - TC with Sean at McCarthy to schedule video conference depositions of Arthur and Elizabet...
9/3/2014	Paralegal	Billed	0.80	9/3/14 - Make multiple copies of exhibits for depositions.
Total Paralegal			10.00	
Total Schold, Michael dba Schold Builders:Sectio...			114.30	
<b>TOTAL</b>			<b>215.50</b>	

**Exhibit 3**

Date	Printing/Copies	Postage	Stenographer	Sheriff Service Fees	Travel/Mileage	Tolls	Bank Fees	Notes
2/26/2013	\$58.80	\$22.54						
7/31/2013	\$4.50	\$1.12						
10/11/2013	\$14.40	\$3.96						
1/24/2014	\$4.20	\$0.66						
2/7/2014	\$9.90	\$4.48						
2/18/2014	\$4.50	\$1.92						
3/12/2014	\$4.35	\$1.61						
3/12/2014	\$4.35	\$1.61						
3/14/2014						\$3.00		
3/14/2014					\$67.24			
4/10/2014	\$42.75							
4/11/2014	\$30.60							
5/27/2014					\$17.36			
6/17/2014					\$59.33			
6/17/2014						\$3.00		
8/22/2014				\$55.58				
8/22/2014				\$87.94				
9/16/2014							\$15.00	
9/17/2014						\$3.00		
9/17/2014					\$67.24			
9/17/2014			\$330.00					Paid
9/18/2014			\$230.80					Paid
9/30/2014	\$44.10	\$23.52						
Sub Totals	\$222.45	\$61.42	\$560.80	\$143.52	\$211.17	\$9.00	\$15.00	\$1,223.36
Credits			-\$560.80					
<b>Total Expenses:</b>	<b>\$662.56</b>							

## **Exhibit 4**

On August 24, 2012, Mr. Schold first contacted Counsel. He stated that in addition to owning rental properties, he operated three unincorporated businesses, which included a real estate development company, a home-building and contracting business, and a trucking company. He said that he was in the midst of an amicable divorce.

On September 20, 2012, Counsel met with Michael and his wife Christine, and learned that Mr. Schold was being sued by an aggrieved homeowner in the Worcester Superior Court.

Five months later, after extensive conferences, the Debtors commenced a Chapter 13 Proceeding in the United States Bankruptcy Court for the Central District of Massachusetts by filing a “skeleton” petition on January 24, 2013. The balance of schedules, statements and a proposed Chapter 13 Plan were filed on February 25, 2013.

The Debtors financial problems were caused by a combination of factors. They included:

- (1) The downturn in the real estate market, which slowed sales of homes built by Mr. Schold in a residential development, and resulted in lower sales prices than anticipated.
- (2) Their cash flow problems were exacerbated by a real estate attachment that was placed on all of their property by the operator of a motorcycle involved in an accident with Mr. Schold, which preventing them from taking out equity or refinancing.

The accident claim was eventually settled for the policy limits, after the accident reconstruction expert retained by their insurer wrote a report stating that the 72 year-old operator of the motorcycle had enough time and distance to stop and control his bike, and that his age may have delayed his reflexes.

- (3) The dispute with Arthur Barbeau and Elizabeth Barbeau over the construction of a custom-built home in Harvard, Massachusetts. The project was successfully completed and a

Certificate of Occupancy was issued by the Town of Harvard Building Inspector on January 9, 2012. The Debtors had expected to make a \$150,000 profit on the house over two years.

The financial problems led to marital problems; the Scholds were living apart at the time their petition for relief was filed, and they remain separated.

During the 19 month period covered by this *Application* (February 4, 2013, through September 30, 2014) (the “Period”), Counsel provided additional services that fall within Section II of his *Retainer Agreement* with the Debtors.

Counsel devoted 59.70 hours to matters concerning additional services as set forth in Section II of the *Chapter 13 Retainer Agreement* during the Period and his assistant Janet Tavano devoted 16.20 hours to general Section II matters, not including the defense of the adversary proceeding filed by attorneys Champagne and Levine-Piro on behalf of the Barbeaus.

In addition, Counsel devoted a total of 103.60 hours to the defense of the Barbeaus’ adversary proceeding (Adv. Pro. 13-04026) and his assistant Janet Tavano devoted 10.00 hours to matters related to the defense of the Barbeaus’ adversary.

A detailed contemporaneous chronology of activity in this case is set forth in **Exhibit 2**.

The additional services provided included the following:

**Secured Lenders:** Communicating with counsel representing the four different holders of mortgages on six real properties jointly owned by the Debtors (10 Pebble Beach Road, Webster MA; 6 Bill Graham Lane, Millbury, MA; 620 Main Street, North Oxford, MA; 689 Main Street, North Oxford, MA; 30 Waters Street, Millbury, MA; 1 Dresser Hill Road, Dudley, MA; and Corinthia Court, Dudley, MA) and one real property owned only by Michael (37 Western Avenue, Millinocket, ME); and responding to motions for relief from stay filed by Millbury Savings Bank as to 1 Dresser Hill Road and Bank of America as to 6 Bill Graham Lane, where Mrs. Schold resides.

**Reviewing proofs of claim filed by creditors, and filing objections as appropriate.** Counsel

objected to five claims, including:

- \* Claim #23 filed by Nelnet in the amount of \$77,448.93. The *Objection* was SUSTAINED by the Court (Docket Item #99);
- \* Claim #22 filed by CitiMortgage, Inc. in the amount of \$174, 268.60, with an arrears claim of \$8,127.36. After filing a response in opposition to the Debtors' *Objection*, CitiMortgage, Inc. Withdrew its Response, and the *Objection* was SUSTAINED by the Court (Docket Item #97);
- \* Claim #9 filed by Wells Fargo Bank, NA in the amount of \$419,05.14, with an arrears claim of \$7,397.83. After negotiating with Counsel for Wells Fargo, the Debtors Withdrew their *Objection* after Wells Fargo filed an *Amended Proof of Claim*. (Docket Item #96); and
- \* Claim #5 filed by American Builders & Contractors Supply, Inc. in the amount of \$8,677.13. This Claim was Withdrawn after Counsel filed an *Objection*. (Docket Item #45).

**Tax Issues.** Responding to a Proof of Claim filed by the Massachusetts Department of Revenue, and other tax issues, including the Debtors' 2013 tax returns which are presently under extension. In addition, Debtors have been advised it may be necessary to have amended tax returns prepared and filed for previous years. Mr. Schold has experienced difficulties in obtaining needed professional accounting services, which were exacerbated by Christine's Schold's stepping back from day-to-day involvement in business financial matters as a result of their marital estrangement.

**Communications with the Standing Chapter 13 Trustee and her staff.** A number of issues arose concerning the administration of the estate, including extensions of deadlines to file an amended Plan, and also responding to baseless allegations made by the Barbeaus' counsel that Mr. Schold had failed to schedule assets. A careful review of the documents produced by attorney Champagne confirmed

that the motor vehicles in question had either been scheduled, or were acquired post-petition by Mr. Schold.

**Modification of the Mortgage Held by Wells Fargo.** The first position mortgage on the property located at 10 Pebble Beach Road, Webster, MA, where Mr. Schold resides, was successfully modified and resulted in a \$500 per month reduction in the monthly payment due. Counsel prepared and filed *Debtors' Motion to Approve Loan Modification Agreement* on February 18, 2014, which was ALLOWED by this Court on March 7, 2014. (Docket Item #122).

**The Dispute with Arthur Barbeau and Elizabeth Barbeau.**

\* On March 20, 2013, Arthur Barbeau and Elizabeth Barbeau filed a *Motion for Retroactive Annulment of Automatic Stay and for Relief from Stay to Liquidate Damages* (Docket Item #41). The Barbeaus sought to by-pass the Bankruptcy Court process and continue with an assessment of damages in the state Superior Court.

Counsel filed an *Opposition* (Docket Item #52). After a hearing before this Court, the Barbeaus' motion for relief from stay was DENIED.

The Court's ORDER (Docket Item #55) further states, "the referenced State Court judgment is deemed Void".

\* On June 19, 2013, Counsel prepared and filed *Debtors' Objection to Proof of Claim filed by Arthur Barbeau and Elizabeth Barbeau f/k/a Elizabeth Mroczka (Claim #16)* (Docket Item #80). The Objection argued that no money was owed to the Barbeaus, and objected to Claim #16, in which the Barbeaus asserted they held a secured claim in the amount of \$131,434.11 by virtue of a recorded attachment, and priority claims in the amount of \$5,500.00. In fact, no attachment was properly recorded against either of the Debtors. An *Opposition* to the Objection was filed by the Barbeaus' Counsel (Docket Item #94).

\* On August 20, 2013, the Court entered an Order (Docket Item #98) consolidating the Debtors' *Claim Objection* with Adversary Proceeding 13-4026, in which the Barbeaus objected to Michael K. Schold's Discharge.

\* On November 12, 2013, after hearing, the Court entered an *Order* in favor of the Debtors (Docket Item #29 in Adv. Pro. 13-4026), which stated that: "The Court finds and rules that the Plaintiffs' claim, if any, constitutes a general unsecured claim".

**Adversary Proceeding 13-4026. The Barbeaus' Objection to Michael K. Schold's Discharge under 11 U.S.C. 523(a)(2)(A) and 11 U.S.C. 523(a)(6).**

\* On June 19, 2013, Counsel filed Defendant Michael K. Schold's *Motion Pursuant to F.R.B.P. Rule 7012(f) to Strike Plaintiff's Amended Complaint*. After the scheduling and noticing of a hearing on Defendant's motion, the *Motion to Strike* was rendered moot by the Plaintiffs' filing of a *Second Amended Complaint* on July 24, 2013.

\* From the outset, the Plaintiffs' prosecution of their *Complaint* against Mr. Schold was marked by procedural errors and inefficiencies to which Counsel has had to respond. The Plaintiffs' state court attorney, Melissa Levine-Piro, was not admitted to practice in this Court, and as of this day still does not participate in the Court's ECF filing and notice system.

\* Attorney Levine-Piro's *Application to Appear Pro Hac Vice* was sponsored by attorney Nadine Champagne as Lead Counsel. Attorney Champagne had never before appeared in an adversary proceeding, and had very limited chapter 13 experience (four cases, all of which were dismissed).

\* An *Answer and Counterclaim* was filed on July 31, 2013, to which attorney Champagne failed to timely responded, leading Counsel to file on September 5, 2013, a request that default be entered against Arthur Barbeau and Elizabeth Barbeau f/k/a Elizabeth Mroczka,

Defendants in Counterclaim. It was only after a hearing was scheduled by the Court that an *Answer* to the *Counterclaim* was filed by attorney Champagne.

- \* Throughout the pendency of the adversary proceeding Counsel has attempted to resolve the dispute as expeditiously as possible. On October 11, 2013, for example, Counsel filed the *Motion of Michael K. Schold for Judgment on the Pleadings or in the Alternative, for Partial Summary Judgment*, with a memorandum in support.
- \* It was at the hearing held on that motion on November 12, 2013, that the Court entered an *Order* in favor of the Debtor, finding and ruling that “the Plaintiffs’ claim, if any, constitutes a general unsecured claim”.
- \* Counsel then engaged in discovery with the Plaintiffs, including the preparation of interrogatories and requests for admission, as well as responding to discovery requests propounded by the Plaintiffs.
- \* On March 12, 2014, Counsel filed the *Second Motion of Michael K. Schold for Judgment on the Pleadings*, in which he argued that because the Plaintiffs failed to timely either answer or object to the *Defendant’s First Request for Admissions to the Plaintiffs Arthur & Elizabeth Barbeau*, each Request was deemed admitted pursuant to F.R.B.P. Rule 7036(a).
- \* An emergency hearing was held before the Court on March 12, 2014, on the discovery disputes, which resulted in a detailed Court Order.
- \* During the final week of March, 2014, Counsel prepared and circulated to Plaintiffs’ attorneys a *Memorandum of Agreement Regarding Discovery Issues* and a *Joint Statement of Counsel*, which were filed with the Court on March 28, 2014.
- \* During this same period, in March, 2014, Counsel attempted to engage Plaintiffs’ counsel in the mediation process, going so far as to obtain and suggest a number of mediators who



possessed bankruptcy experience. (Many of the mediators on the list maintained by the U.S. Bankruptcy Court are retired state court judges, who have little if any familiarity with dischargeability issues.)

- \* During April and May, 2014, the parties continued to engage in discovery, including the filing by the Plaintiffs' attorneys of motions to take R. 2004 Examinations of non-parties, which were denied by the Court for procedural reasons.
- \* On May 23, 2014, the Plaintiffs took the deposition testimony of Christine Schold.
- \* On June 17, 2014, a final pre-trial conference was held in Springfield. At that time the Court set a discovery deadline of September 19, 2014, and set the matter down for a two-day trial on November 13 and 14, 2014.
- \* In conversation with Plaintiffs' attorneys afterwards, they expressed interest in settlement.
- \* Counsel and Christine Schold prepared a detailed response to the settlement demand made by attorney Levine-Piro, which was sent to her on June 26, 2014. On the following day Counsel received a response rejecting the Defendant's settlement proposal, and stating that the Barbeaus wanted to go to trial.
- \* On July 22, 2014, Counsel issued *Notices of Depositions* of Arthur Barbeau and Elizabeth Barbeau.
- \* On July 25, 2014, the Plaintiffs took the deposition of Michael Schold.
- \* On August 13, 2014, Counsel issued document deposition subpoenas to Robert McDermott, Plaintiffs' purported expert witness, and to Corey and Conrad Dufresne, who had purchased the house in Harvard, MA from the Barbeaus.

- \* Corey Dufresne, who is an attorney, filed an objection to Counsel's subpoena, and attorney Champagne filed a *Motion to Quash* the deposition subpoena served on Robert McDermott. Both disputes were later resolved, and the requested documents were produced.
- \* On August 27, 2014, the Plaintiffs filed their *Motion to Dismiss Debtors' Chapter 13 Case for Cause, Or in the Alternative to Convert from Chapter 13 to Chapter 7 for Bad Faith Filing with Prejudice*.
- \* Also in August, Counsel completed preparations to take video depositions of the Barbeaus, which were held on September 5, 2014, as scheduled.
- \* On September 15, 2014, the Debtors' filed their *Opposition to the Motion of Arthur and Elizabeth Barbeau to Dismiss Chapter 13 Case*. In their *Opposition to the Motion to Dismiss*, the Debtors argued that dismissal of the Scholds' bankruptcy case was not in either the Barbeaus' or the Scholds' best interests. A two day trial was scheduled to begin before this Court in less than eight weeks, and the parties had completed discovery pursuant to this Court's *Amended Pre-Trial Order*.
- \* On September 17, 2014, this Court entered an Order dismissing the Chapter 13 Case "due to the Debtors' failure to file operating reports for their business".
- \* On September 26, 2014, Debtors' filed their *Motion for Reconsideration*, to which they attached copies of the Profit & Loss Statements for Schold Trucking for the calendar year 2013, and for the period of January through August, 2014.
- \* The *Motion for Reconsideration* was denied by the Court on September 30, 2014.

## **Exhibit 5**

### **Biographical Information**

Mr. Stone received his Bachelor of Arts Degree from Clark University in 1975. Mr. Stone received his legal education from Northeastern University, where he was awarded a Juris Doctorate Degree in 1984.

During his entire professional career Mr. Stone has concentrated his practice in the area of bankruptcy and commercial litigation. He is admitted to practice before the Supreme Judicial Court of Massachusetts, the U.S. District Court for the District of Massachusetts, the First Circuit Court of Appeals, and the U.S. Supreme Court.

Mr. Stone is a member of the American Bankruptcy Institute, the Massachusetts Bar Association, and the Worcester County Bar Association. He co-chaired the Worcester County Bar Association's Bankruptcy Court Committee from September, 1993 through August, 1996, and served two terms on the Bar Association's Executive Committee from September, 1996 through August, 2000. In October, 2010, attorney Stone was asked to serve on the newly created Executive Committee of the Worcester County Bar Association's Bankruptcy Court Committee. In June, 2014, attorney Stone was elected to a three year term on the Bar Association's Executive Committee commencing in September, 2014.

His reported cases include: *In re Giarizzo*, 128 B.R. 321 (1991); *Duco Enterprises, Inc. v. William Abdelnour*, 1994 Mass. App. Div. 103; *Bastien v. New England Recreational Systems Corp.*, 3 Mass. L. Rptr. No. 26, 556 (June 26, 1995); *In re Ledis*, 259 B.R. 472 (Bankr. D. Mass. 2001); *In re Van Dyke*, 296 B.R. 591 (Bankr. D. Mass. 2003); *In Re Jacalyn S. Nosek*, 2006 WL 1867096 (Bankr. D. Mass. 2006); *Ameriquest v. Nosek* (In re: Nosek), 354 B.R. 331 (D.Mass. 2006); *In re: Nosek* (Nosek v. Ameriquest Mortgage Company); 363 B.R. 643 (Bankr.D.Mass.2007); *In re: O'Leary*, 2007 WL 1746388 (Bankr.D.Mass. 2007); *Nickless v. Lodi* (In re Lodi), 2007 Bankr. LEXIS 3075 (Bankr. D. Mass. 2007); and *R.L. Whipple Co., Inc. v. Pondview Excavation Corp.*, 71 Mass. App. 871 (2008).

He has lectured for Massachusetts Continuing Legal Education Programs, Professional Education Systems, Inc., Lorman Education Services, the Worcester County Bar Association, the Massachusetts Fair Housing Center, and the United Way of Massachusetts.

Mr. Stone's civic activities include active participation in the Worcester County Chapter, ACLU of Massachusetts (President, October 1993 to September 1997, Board of Directors, October 1991 to December 1998); and Worcester Common Ground, Inc., (President, January 1996 to January 1999; Vice President, January 1995 to January 1996; Director, January 1994 *to date*.)

He served on the Princeton Board of Health from 1995-1998, and served as a member of the Affordable Housing Sub-committee of Princeton's Master Plan Committee.

He has served as a Trustee of the Worcester Friends Meeting (Quaker) since 2002, and served as Clerk of the Trustees from January, 2009 through January, 2010. In August, 2009, Attorney Stone was appointed to the Permanent Board of the New England Yearly Meeting of the Religious Society of Friends (Quaker), and re-appointed to a second five-year term in August 2014.

## **Biographical Information - Janet Tavano**

### **PROFESSIONAL EXPERIENCE**

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#### **2007 - Present Date, Philip M. Stone, Esq. Worcester, MA**

##### *Legal Assistant*

Full-time position assisting attorney in all office duties, including document preparation (bankruptcy, real estate, and corporate administration); preparation of bankruptcy petitions, schedules and pleadings; organization of real estate transactions from offer to purchase to closing; meetings with clients to collect information; review of documents with clients; maintain attorney schedule and office accounts; file management; and telephone reception.

#### **1999 – 2010, Carl E. Baylis, Esq. (Ret.) Worcester, MA**

##### *Legal Assistant/Office Manager*

Full time position (shared time position began 2005) assisting attorney in all office duties, including, preparation of legal documents (estate planning, estate administration, corporate, real estate, tax matters); organization of real estate transactions from offer to purchase to closing; maintain corporate records; preparation of Federal and state estate tax returns for taxable estates; maintenance of office bank accounts, accounts payable, accounts receivable, attorney schedule; client communication to collect information and review documents; management of office shared with two other attorneys with respect to office rental matters (communication with landlord, requests for office maintenance and organization of all shared office expenses); file management; telephone reception; and supply management.

#### **2005 – 2006 Arthur J. Giacomarra, Esq. Worcester, MA**

##### *Legal Assistant*

Assisting attorney, as needed, with document preparation (estate planning, estate administration, corporate, and real estate) including Federal and state estate tax returns, organization of real estate transactions and telephone reception.

#### **1997 – 1999 Simonelli & Associates Southbridge, MA**

##### *Legal Assistant*

Full time position assisting attorney in all office duties, including preparation of legal documents (estate planning, estate administration, real estate, corporate, personal injury and divorce); communication with clients to obtain information and review documents; communication with medical professionals, insurance companies and client employers to obtain information; file management and telephone reception.

#### **1992 – 1997 Kressler & Kressler Worcester, MA**

##### *Legal Assistant*

Full time position assisting attorney in all office duties, including document preparation (bankruptcy, real estate, corporate and estate administration); preparation of bankruptcy petitions; organization of real estate transactions from offer to purchase to closing; meetings with clients to collect information; review of documents with clients; maintain attorney schedule and office bank accounts; file management; and telephone reception.

EDUCATION

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1992            Burdett School            Worcester, MA

*Executive Secretary - Valedictorian*  
Executive secretarial program – Diploma

1987            Woodstock Academy            Woodstock, CT

*High School*

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ADDITIONAL PROFESSIONAL ACTIVITIES

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Massachusetts Notary Public

Connecticut Notary Public